

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Anderson County
R. Scott Sprouse, Circuit Court Judge

ORIGINAL

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JUN 12 2013

TIMOTHY CROSBY,

S.C. SUPREME COURT
PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2018-002279

MOTION FOR AN EXTENSION OF TIME
IN WHICH TO FILE THE PETITION FOR WRIT OF
CERTIORARI AND APPENDIX

Counsel for Timothy Crosby respectfully requests an extension of thirty (30) days in which to file the petition for writ of certiorari and appendix in this case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. This is a second request for an extension. In support of this request, counsel shows:

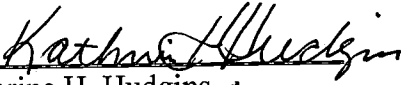
1. The petition for writ of certiorari and appendix are due to be served and filed with the Court today.
2. Counsel for Timothy Crosby respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions previously granted and the order in which counsel attempts to manage her caseload, counsel hopes that no further extension requests will be required.

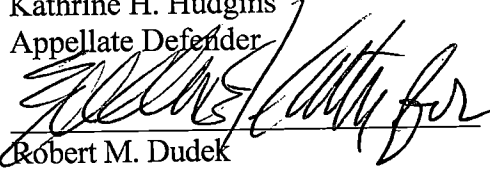
3. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Desmond J. Sams v. The State of South Carolina with this Court on June 6, 2019. Counsel filed the Anders brief of appellant and designation of matter in the case of The State of South Carolina v. Venson Tyrone Jones with the Court of Appeals on May 31, 2019. Counsel filed the return to petition for writ of certiorari in the case of McIver R. Feagin, Jr. v. The State of South Carolina with this Court on May 17, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Ryan P. Deleston v. The State of South Carolina with this Court on May 13, 2019. Counsel filed the petition for rehearing in the case of State v. Dean Alton Holcomb with the Court of Appeals on May 2, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Mitchell Logan Hinson v. The State of South Carolina with this Court on April 26, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Joey Clark v. The State of South Carolina with this Court on April 24, 2019. Counsel filed the Anders brief of appellant and designation of matter in the case of The State of South Carolina v. Jimmy Byron Keith Curles with the Court of Appeals on April 16, 2019.

4. Counsel makes this request in good faith and not for purpose of delay.
5. Counsel for the Attorney General's office has been informed of this request.

WHEREFORE, the undersigned counsel would respectfully request a thirty day extension, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,


Kathrine H. Hudgins
Appellate Defender


Robert M. Dudek
Chief Appellate Defender

Attorney for Petitioner

June 12, 2019

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Anderson County
R. Scott Sprouse, Circuit Court Judge

TIMOTHY CROSBY,

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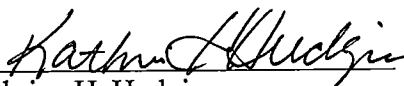
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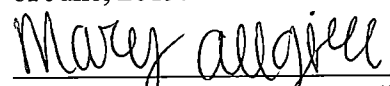
CERTIFICATE OF SERVICE

I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon Megan Harrigan Jamison, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 12th day of June, 2019.


Kathrine H. Hudgins
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 12th day
of June, 2019.

 (L.S.)
Notary Public for South Carolina
My Commission Expires: May 12, 2027.