

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Berkeley County

Michael G. Nettles, Circuit Court Judge

RECEIVED

JUN 12 2019

SAMUEL BROWN,

S.C. SUPREME COURT

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2019-002208

**PETITION FOR EXTENSION TO FILE
PETITION FOR WRIT OF CERTIORARI
AND APPENDIX**

The undersigned counsel would respectfully request a thirty-day extension in which to file the petition for writ of certiorari and appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following exigent circumstances:

1. The petition for writ of certiorari and appendix in this case are due to be served and filed today, having been extended by one prior order of this Court.

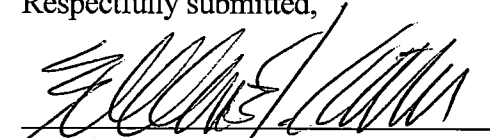
2. Counsel will file the Johnson petition for writ of certiorari in the case of James D. White v. State with the Supreme Court today, June 12, 2019. Counsel filed the petition for writ of certiorari in the case of Jameco Abdul Toney v. State with the Supreme Court on May 31, 2019. Counsel filed the Anders brief pursuant to White v. State in the case of Christopher Hampton v. State with the Supreme Court on May 31, 2019. Counsel filed the petition for writ of certiorari pursuant to Austin v. State in the case of Christopher Hampton v. State with the Supreme Court on May 31, 2019. Counsel filed the petition for writ of certiorari in the case of Christopher Hampton v. State with the Supreme Court on May 31, 2019. Counsel filed the petition for rehearing in the case of State v. Jermaine Antonio Hodge with the Court of Appeals on May 23, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix and in the case of Travis Harris v. State with the Supreme Court on May 13, 2019. Counsel filed the Johnson petition for writ of certiorari in the case of Benjamin L. Smalls v. State with the Supreme Court on May 6, 2019. Counsel filed the Johnson petition for writ of certiorari in the case of Ivan Williams v. State with the Supreme Court on May 6, 2019. Counsel filed the Anders brief of appellant and designation of matter in the case of State v. William Sidney Crump, Jr. with the Court of Appeals on May 2, 2019. Counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of State v. Michael Fulwiley with the Supreme Court on May 2, 2019. Counsel filed the Anders brief of appellant and designation of matter in the case of State v. Sheldon Alonzo Watson with the Court of Appeals on May 1, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix and accompanying supplemental appendix in the case of Elliot Judon v. State with the Supreme Court on April 29, 2019. Counsel

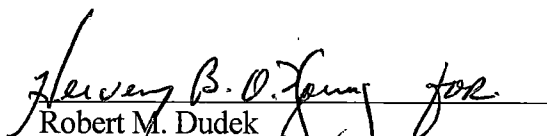
filed the petition for writ of certiorari to the Court of Appeals in the case of State v. Gerald Jarrod Ancrum with the Supreme Court on April 15, 2019. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of State v. Hershel Mark Jefferson, Jr., with the Supreme Court on April 15, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Almondo D. Washington v. State with the Supreme Court on April 10, 2019.

3. This request is made in good faith, and not for purposes of delay.

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. Counsel requests that the time limits for filing the petition for writ of certiorari be held in abeyance pending a ruling on this motion.

Respectfully submitted,


Wanda H. Carter
Deputy Chief Appellate Defender


Robert M. Dudek
Chief Appellate Defender

June 12, 2019

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Berkeley County

Michael G. Nettles, Circuit Court Judge

SAMUEL BROWN,

PETITIONER,

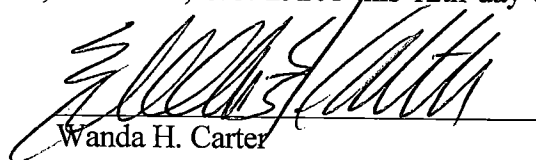
V.

STATE OF SOUTH CAROLINA,

RESPONDENT

CERTIFICATE OF SERVICE

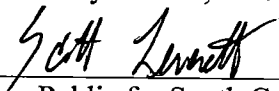
I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon Jordan Cox, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room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



Wanda H. Carter
Appellate Defender

ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me
this 12th day of June, 2019.



(L.S.)
Notary Public for South Carolina
My Commission Expires: September 27, 2028.