

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Pickens County

Honorable Alex Kinlaw, Circuit Court Judge

ALBERT LAVERNE TAYLOR,

PETITIONER,

V.

STATE OF SOUTH CAROLINA

RESPONDENT

APPELLATE CASE NO. 2019-000126

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

Counsel for Albert Laverne Taylor 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 Albert Laverne Taylor 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.

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S.C. SUPREME COURT

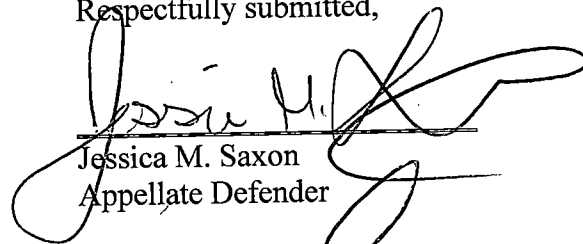
3. Counsel is preparing and consulting with Chief Appellate Defender, Robert M. Dudek, on the petition for writ of certiorari and accompanying appendix in the cases of Jason Johnson v. The State, Michael Williams v. The State, and David Coon v. The State which she plans to file with this Court in the upcoming weeks.

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,



Jessica M. Saxon
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

Attorney for Petitioner

July 3, 2019

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Pickens County
Honorable Alex Kinlaw, Circuit Court Judge

ALBERT LAVERNE TAYLOR,

PETITIONER,

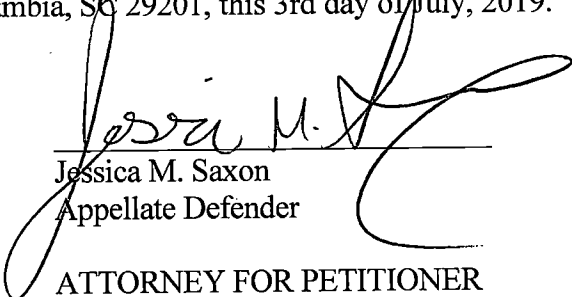
V.

STATE OF SOUTH CAROLINA

RESPONDENT

CERTIFICATE OF SERVICE

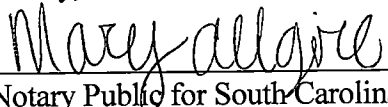
I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon Janell Gregory, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 3rd day of July, 2019.



Jessica M. Saxon
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 3rd day
of July, 2019

 (L.S.)

Notary Public for South Carolina
My Commission Expires: May 12, 2027.