

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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Certiorari to Anderson County

Honorable R. Scott Sprouse, Circuit Court Judge

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TIMOTHY CROSBY,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2018-002279

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

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Counsel for Timothy Crosby respectfully requests a **final thirty (30) day extension, until August 12, 2019**, 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 third request for an extension. In support of this request, counsel shows:

1. The petition for writ of certiorari and appendix are due to be filed with the Court today. The Court has granted counsel two previous extensions.
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

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PETITIONER,

previously granted and the order in which counsel attempts to manage his caseload, counsel hopes that no further extension requests will be required.

3. Counsel filed the petition for rehearing in the case of Aaron Young, Sr. v. The State of South Carolina with the Court of Appeals on July 11, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Nathaniel Mitchell v. The State of South Carolina with this Court on July 1, 2019. Counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of Dean Alton Holcomb v. The State of South Carolina with this Court on June 24, 2019. Counsel filed the Anders brief of appellant and designation of matter in the case of The State of South Carolina v. Aundra Hunter, Jr. with the Court of Appeals on June 21, 2019. 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.

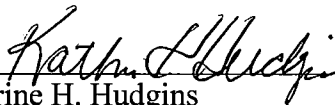
4. Counsel makes this request in good faith and not for purpose of delay.

5. Counsel for the Attorney General's office consents to this request as shown by signature below.

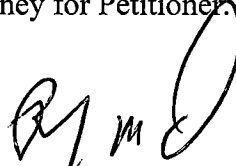
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until August 12, 2019**, in which to file the petition for writ of certiorari and

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

Attorney for Petitioner.

  
Robert M. Dudek  
Chief Appellate Defender

This 12<sup>th</sup> day of July, 2019.

I consent:

  
for Megan Harrigan Jameson, Esquire