

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Spartanburg County

Michael G. Nettles, Circuit Court Judge  
\_\_\_\_\_

KELVIN EUGENE COHEN,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2019-000408  
\_\_\_\_\_

**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 filed the petition for writ of certiorari and accompanying appendix in the case of Tyress Antonio Littlejohn v. State with the Supreme Court on

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AUG 05 2019

S.C. SUPREME COURT

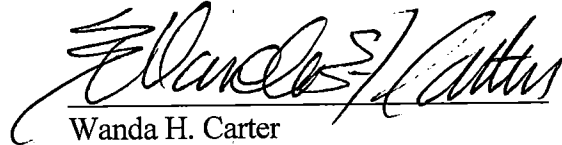
PETITIONER,

August 2, 2019. Counsel filed the petition for rehearing in the case of Demetrius Simmons v. State with the Court of Appeals on August 1, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Brandon Bartley v. State with the Supreme Court on July 29, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Wallace Glover v. State with the Supreme Court on July 5, 2019. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of Rhajon Sanders v. State with the Supreme Court on July 5, 2019. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of David Young v. State with the Supreme Court on July 5, 2019. Counsel filed the Johnson petition for writ of certiorari and the accompanying appendix in the case of Demetrius Summers v. State with the Supreme Court on July 5, 2019. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of David T. Gallman v. State with the Supreme Court on June 28, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Devionne McClain v. State with the Supreme Court on June 14, 2019. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of James D. White v. State with the Supreme Court on June 12, 2019. Counsel had an oral argument in the case of Eugene Thomas v. State in the Supreme Court on June 11, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix 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.

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,

A handwritten signature in black ink, appearing to read "Wanda H. Carter", written over a horizontal line.

Wanda H. Carter  
Deputy Chief Appellate Defender

A handwritten signature in black ink, appearing to read "Robert M. Dudek", written over a horizontal line.

Robert M. Dudek  
Chief Appellate Defender

August 5, 2019

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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S.C. SUPREME COURT

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PETITIONER,

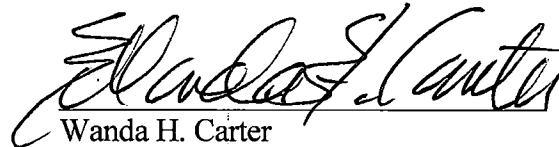
V.

STATE OF SOUTH CAROLINA,

RESPONDENT

\_\_\_\_\_  
CERTIFICATE OF SERVICE  
\_\_\_\_\_

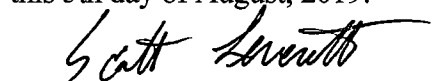
I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon Janell Gregory, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, S.C. 29201 this 5<sup>th</sup> day of August, 2019.



Wanda H. Carter  
Appellate Defender

ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me  
this 5th day of August, 2019.

 (L.S.)

Notary Public for South Carolina  
My Commission Expires: September 27, 2028.