

**ORIGINAL**

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Charleston County

Honorable G. Thomas Cooper, Circuit Court Judge  
\_\_\_\_\_

RECEIVED

AUG 07 2019

S.C. SUPREME COURT

DERELL GREEN,

PETITIONER,

V.

STATE OF SOUTH CAROLINA

RESPONDENT

APPELLATE CASE NO. 2019-000446  
\_\_\_\_\_

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

Counsel for Derell Green 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:

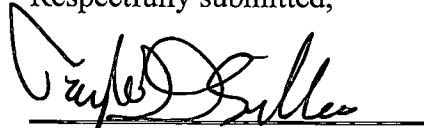
1. The petition for writ of certiorari and appendix are due to be served and filed with the Court today.
2. Counsel for Derell Green respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions previously granted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

3. Counsel will file the petition for writ of certiorari and accompanying appendix in the case of Willie Stevenson v. The State with this Court today, August 7, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of James Frady v. The State with this Court on July 29, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Mark Lorenzo Blake with the Court of Appeals on July 24, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Wayne Cooper v. The State with this Court on July 22, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Isaac Williams v. The State with this Court on July 5, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Stephen Francois v. The State with this Court on July 3, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Marvin Bowens-Green v. The State with this Court on June 27, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Vaughn Hilliard v. The State with this Court on June 24, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of John Sessions v. The State with this Court on June 17, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Kenneth Murray v. The State with this Court on June 17, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of DeAngelo Mickell v. The State with this Court on June 12, 2019.

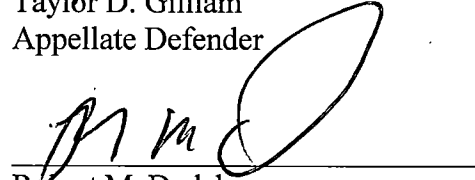
4. Counsel makes this request in good faith and not for purpose of delay.
5. Counsel for the Attorney General's office has been informed of this request.

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,



Taylor D. Gilliam  
Appellate Defender



Robert M. Dudek  
Chief Appellate Defender

August 7, 2019

Attorney for Petitioner

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Charleston County  
Honorable G. Thomas Cooper, Circuit Court Judge  
\_\_\_\_\_

RECEIVED

AUG 07 2019

S.C. SUPREME COURT

DERELL GREEN,

PETITIONER,

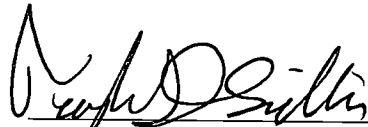
V.

STATE OF SOUTH CAROLINA

RESPONDENT

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

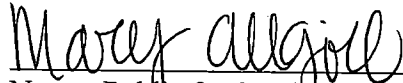
I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon Benjamin Limbaugh, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 7th day of August, 2019.



\_\_\_\_\_  
Taylor D. Gilliam  
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 7th day  
of August, 2019.

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