

RECEIVED
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S.C. SUPREME COURT

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

ORIGINAL

Certiorari to Spartanburg County
Michael G. Nettles, Circuit Court Judge

KELVIN COHEN,

PETITIONER,

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 **final thirty-day extension, until October 3, 2019**, 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:

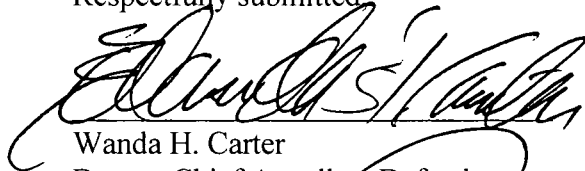
1. The petition for writ of certiorari and appendix in this case are due to be served and filed today, having been extended by two prior orders of this Court.
2. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Izell Hair v. State with the Supreme Court on August 21, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of

Adrian Keith Neal v. State with the Supreme Court on August 6, 2019. Counsel filed the Johnson petition for writ of certiorari pursuant to Austin v. State in the case of Adrian Keith Neal v. State with the Supreme Court on August 6, 2019. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Samuel Brown v. State with the Supreme Court on August 2, 2019. 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 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.

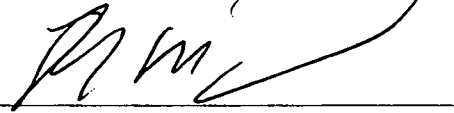
3. As indicated by her consent below, counsel for the state graciously consents to or does not oppose this request.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty-day extension, until October 3, 2019**, 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,



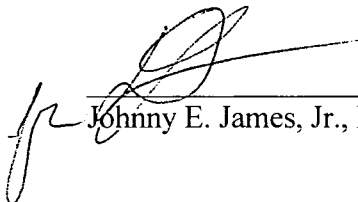
Wanda H. Carter
Deputy Chief Appellate Defender



Robert M. Dudek
Chief Appellate Defender

September 4, 2019

I DO NOT OPPOSE:



Johnny E. James, Jr., Esquire