

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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

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

DERRELL GREEN,

V.

STATE OF SOUTH CAROLINA

RESPONDENT

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

MOTION FOR EXTENSION TO FILE  
PETITION FOR WRIT OF CERTIORARI  
AND ACCOMPANYING APPENDIX  
\_\_\_\_\_

The undersigned counsel respectfully requests a **final thirty-day extension, until October 7, 2019**, in which to file the petition for writ of certiorari and accompanying appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The petition for writ of certiorari and accompanying appendix in this case are due to be served and filed today.

2. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Chad Stalnaker v. The State with this Court on September 5, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Susan Hendricks v. The State with this Court on August 30, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Mark Day with the Court of Appeals on August

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S.C. SUPREME COURT  
PETITIONER,

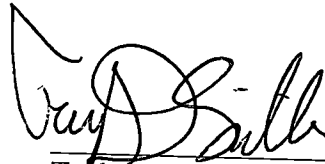
27, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Charles Davis v. The State with this Court on August 23, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Clifton Cooke v. The State with this Court on August 16, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Willie Stevenson v. The State with this Court on 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.

3. As indicated by his consent below, counsel for the state does not oppose this request.

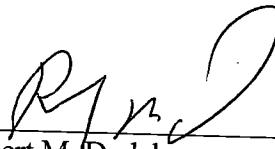
4. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty-day extension, until October 7, 2019**. Counsel respectfully requests that the time limits for filing the petition for writ of certiorari and accompanying appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Taylor D. Gilliam  
Appellate Defender



Robert M. Dudek  
Chief Appellate Defender

September 6, 2019

I do not oppose:



*For* Benjamin Limbaugh, Esquire