

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

ORIGINAL

Certiorari to Richland County

Honorable J. Derham Cole, Circuit Court Judge

RECEIVED

SEP 11 2019

JEFF CHESNUT,

S.C. SUPREME COURT

PETITIONER,

V.

STATE OF SOUTH CAROLINA

RESPONDENT

APPELLATE CASE NO. 2019-000347

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

Counsel for Jeff Chesnut 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:

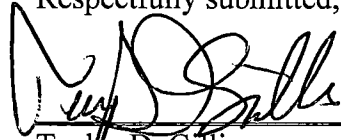
1. The petition for writ of certiorari and appendix are due to be served and filed with the Court today.
2. Counsel for Jeff Chesnut respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions previously granted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

3. Counsel has an oral argument before the Court of Appeals in the case of Michael Elders v. The State today, September 11, 2019. 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 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.

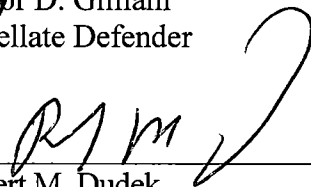
4. Counsel makes this request in good faith and not for purpose of delay.
5. Counsel for the Attorney General's office has been informed of this request.

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

September 11, 2019

Attorney for Petitioner

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Richland County
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JEFF CHESNUT,

PETITIONER,

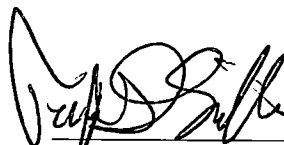
V.

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 Lindsey McCallister, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 11th day of September, 2019.



Taylor D. Gilliam
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 11th day
of September, 2019.

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