

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Florence County
Honorable Michael G. Nettles, Circuit Court Judge

TYRONE JOSEPH WHATLEY,

V.

STATE OF SOUTH CAROLINA,

PETITIONER, SUPREME COURT

RESPONDENT

Appellate Case No. 2019-000111

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

Counsel for petitioner 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 petitioner 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.

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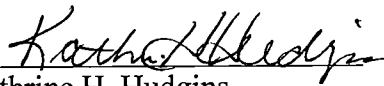
3. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jaimie S. Obregon v. The State of South Carolina with this Court on September 9, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Charles Gary Singletary v. The State of South Carolina with this Court on September 5, 2019. Counsel filed the return to petition for rehearing in the case of State v. Gary Eugene Lott with this Court on August 26, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State of South Carolina v. Benjamin Blake with the Court of Appeals on August 22, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Richard Stribling v. The State of South Carolina with this Court on August 20, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State of South Carolina v. Jyquez Julius Freeman with the Court of Appeals on August 9, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Timothy Crosby v. The State of South Carolina with this Court on August 7, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Keenan Coakley v. The State of South Carolina with this Court on July 31, 2019. Counsel filed the petition for writ of certiorari pursuant to Austin v. State and accompanying appendix in the case of Jonta Green v. The State of South Carolina with this Court on July 26, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of John M. Cureton v. The State of South Carolina with this Court on July 24, 2019. Counsel filed the Anders brief of appellant and designation of matter in the case of The State of South Carolina v. Drake Edward Campbell with the Court of Appeals on July 16, 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,


Kathrine H. Hudgins
Appellate Defender

Attorney for Petitioner


Robert M. Dudek
Chief Appellate Defender

This 16th day of September, 2019

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IN THE SUPREME COURT

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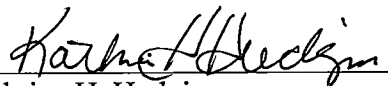
V.

STATE OF SOUTH CAROLINA,

RESPONDENT

CERTIFICATE OF SERVICE

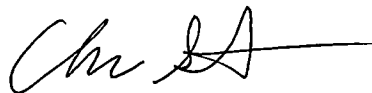
I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon Lindsey McCallister, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 16th day of September, 2019.



Kathrine H. Hudgins
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME
this 16th day of September, 2019.



(L.S.)

Notary Public for South Carolina
My Commission Expires: October 26, 2019.