

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to York County  
Honorable Thomas A. Russo, Circuit Court Judge

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ORIGINAL

JARVIS HUGHES,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2019-000459

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

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Counsel for Jarvis Hughes respectfully requests a **final thirty (30) day extension, until November 4, 2019**, 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 third request for an extension. In support of this request, counsel shows:

1. The petition for writ of certiorari and appendix are due to be filed with the Court today. The Court has granted counsel two previous extensions.
2. Counsel for Jarvis Hughes 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 his caseload, counsel hopes that no further extension requests will be required.

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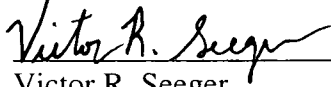
3. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Charles Myers v. The State with this Court on September 16, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Travis Lamont Gathers with the Court of Appeals on September 13, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Ryais Ryché Rivers v. The State with this Court on August 27, 2019. Counsel filed the Anders brief of appellant and designation of matter in the case of The State v. James Michael Brooks with the Court of Appeals on August 27, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Michael F. Wiggleton v. The State with this Court on August 27, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Ivan Lamar Tyrell Harris with the Court of Appeals on August 21, 2019. Counsel filed the petition for rehearing in the case of The State v. Michael Jay Finley with the Court of Appeals on August 1, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Joseph O. Morant v. The State with this Court on July 31, 2019.

4. Counsel makes this request in good faith and not for purpose of delay.

5. Counsel for the Attorney General's office consents to this request as shown by signature below.

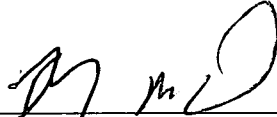
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until November 4, 2019**, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,

  
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Victor R. Seeger  
Appellate Defender


Attorney for Petitioner.

  
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Robert M. Dudek  
Chief Appellate Defender

This 3<sup>rd</sup> day of October, 2019.

I consent:

  
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for Janell Gregory, Esquire