

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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

ORIGINAL

MICHAEL D. MADDOX,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2019-000414

RECEIVED

OCT 04 2019

S.C. SUPREME COURT

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

Counsel for Michael D. Maddox 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 Michael D. Maddox 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.

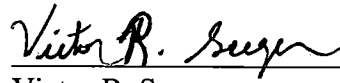
3. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Charles Myers v. The State with this Court on September 16, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Travis Lamont Gathers with the Court of Appeals on September 13, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Ryais Ryche 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,



Victor R. Seeger
Appellate Defender

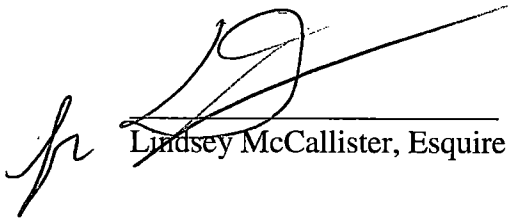
Attorney for Petitioner.



Robert M. Dudek
Chief Appellate Defender

This 4th day of October, 2019.

I consent:



Lindsey McCallister, Esquire