

ORIGINAL

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Laurens County

Honorable Brian M. Gibbons, Circuit Court Judge

RECEIVED

OCT 16 2019

S.C. SUPREME COURT

FRED LEWIS MADDEN,

PETITIONER,

V.

STATE OF SOUTH CAROLINA

RESPONDENT

APPELLATE CASE NO. 2019-001000

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

Counsel for Fred Lewis Madden 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 Fred Lewis Madden 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.

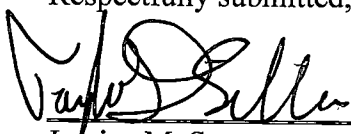
3. Counsel filed the initial brief of appellant in the case of The State v. Marcus Todd on September 27, 2019 with the Court of Appeals. Counsel filed the return to petition for writ of certiorari in the case of Michael Williams v. The State on September 16, 2019 with the Supreme Court. Counsel filed the return to petition for writ of certiorari in the case of Marie Faltas v. The State on September 13, 2019 with the Supreme Court. Counsel filed the petition for writ of certiorari in the case of Albert Taylor v. The State on September 3, 2019 with the Supreme Court. Counsel filed the reply to brief of petitioner in the case of John Willie Mack v. The State on August 15, 2019 with the Court of Appeals. Counsel filed the petition for writ of certiorari in the case of Jason Johnson v. The State on August 9, 2019 with the Supreme Court.

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

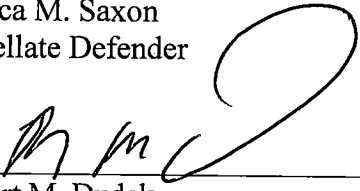
5. Counsel for the Attorney General's office has been informed of this request.

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,

for 

Jessica M. Saxon
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

Attorney for Petitioner

October 16, 2019

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Laurens County
Honorable Brian M. Gibbons, Circuit Court Judge

FRED LEWIS MADDEN,

PETITIONER,

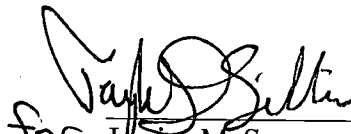
V.

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 Janell Gregory, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 16th day of October, 2019.


for _____
Jessica M. Saxon
Appellate Defender

ATTORNEY FOR PETITIONER

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

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