

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Marion County  
Michael G. Nettles, Circuit Court Judge  
\_\_\_\_\_

**ORIGINAL**  
**RECEIVED**

NOV 16 2019

S.C. SUPREME COURT

PATRICK DAVID VAUGHN,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2019-000150  
\_\_\_\_\_

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

Counsel for Patrick David Vaughn respectfully requests a **final thirty (30) day extension, until November 18, 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 served and filed with the Court today. The Court has granted counsel two previous extensions.

2. Counsel for Patrick David Vaughn 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.

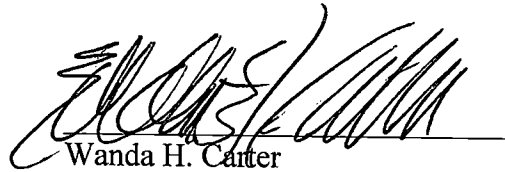
3. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Kelvin Eugene Cohen v. State with the Supreme Court on October 3, 2019. Counsel filed the brief of respondent in the case of Hubert Brown v. State with the Court of Appeals on September 27, 2019. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of Jermaine Antonio Hodge v. State with the Supreme Court on September 18, 2019. Counsel filed the Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Edward Stackhouse v. State with the Supreme Court on September 17, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Donetelle D. Cannon v. State with the Supreme Court on September 16, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Troy Darnell Hunter v. State with the Supreme Court on September 3, 2019. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Izell Hair v. State with the Supreme Court on August 21, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Adrian Keith Neal v. State with the Supreme Court on August 6, 2019.

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

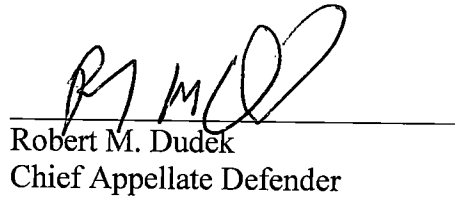
5. Counsel for the Attorney General's office has been informed of this request as shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until November 18, 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 for Writ of Certiorari and Appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



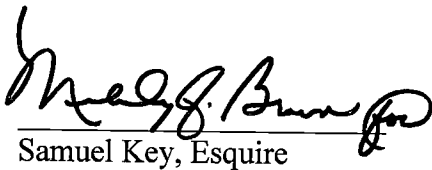
Wanda H. Carter  
Deputy Chief Appellate Defender



Robert M. Dudek  
Chief Appellate Defender

This 16th day of October, 2019.

I consent:



Samuel Key, Esquire