

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Spartanburg County

Thomas A. Russo, Circuit Court Judge

TAMARCUS LONG,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT.

ORIGINAL
RECEIVED
OCT 17 2019
SC Court of Appeals

APPELLATE CASE NO. 2019-000768

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

Counsel for Tamarcus Detrelle Long 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 Tamarcus Detrelle Long 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.

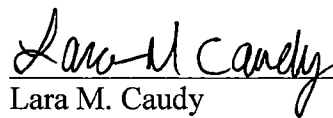
3. On October 15, 2019, counsel had an oral argument in The State v. Terrell Artieth Smith before the Supreme Court. On October 4, 2019, counsel filed a petition for writ of certiorari and accompanying appendix in Mildred Montgomery v. The State with the Supreme Court. On October 1, 2019, counsel filed a petition for writ of certiorari and accompanying appendix in Otis Maurice Robinson v. The State with the Supreme Court. On September 27, 2019, counsel filed a petition for writ of certiorari and accompanying appendix in Larry Brayboy v. The State with the Supreme Court. From September 23, 2019 through September 25, 2019, counsel attended the Annual Public Defender Conference in Myrtle Beach. On September 18, 2019, counsel filed the initial brief of appellant and designation of matter in The State v. Keunte Cobbs with the Court of Appeals. On September 12, 2019, counsel filed a petition for rehearing in The State v. George Holmes with the Court of Appeals. On August 30, 2019, counsel filed the brief of respondent in The State v. Archie More Hardin with the Supreme Court. On August 27, 2019, counsel filed a petition for writ of certiorari and accompanying appendix in Michelle S. Allison v. The State with the Supreme Court. On August 26, 2019, counsel filed the petition for rehearing in The State v. Anthony M. Enriquez with the Court of Appeals. On August 21, 2019, counsel filed a petition for writ of certiorari and accompanying appendix in Domoneik Antwan Washington v. The State with the Supreme Court. On August 9, 2019, counsel filed a petition for writ of certiorari and accompanying appendix in Leroy Clifton Gibbs, III v. The State with the Supreme Court.

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

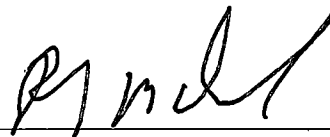
5. Counsel for the Attorney General's office has been informed of this request.

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 for writ of certiorari and appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Lara M. Caudy
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 17th day of October, 2019.

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Appeal from Spartanburg County
Thomas A. Russo, Circuit Court Judge

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TAMARCUS LONG,

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RESPONDENT.

CERTIFICATE OF SERVICE

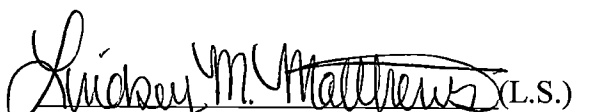
I certify that a copy of the Motion for an Extension of Time in which to file the petition for writ of certiorari and appendix in the above referenced case has been served upon Johnny Ellis James, Jr., Esquire, Assistant Attorney General, at the Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 17th day of October, 2019.



Lara M. Caudy
Appellate Defender

ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me
this 17th day of October, 2019.

 (L.S.)
Notary Public for South Carolina
My Commission Expires: October 22, 2024.