

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

ORIGINAL

Certiorari to Florence County

Honorable George M. McFaddin, Circuit Court Judge

JEFFREY THOMAS BROWN,

RECEIVED
PETITIONER,

V.

OCT 30 2019

STATE OF SOUTH CAROLINA

S.C. SUPREME COURT
RESPONDENT

APPELLATE CASE NO. 2019-000709

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

Counsel for Jeffrey Thomas Brown 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 Jeffrey Thomas Brown 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.

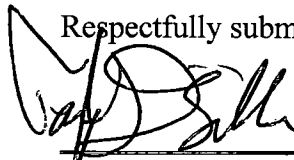
3. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of John Hicks v. The State with this Court on October 28, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jarret Graddick v. The State with this Court on October 14, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Derrell Green v. The State with this Court on October 7, 2019. Counsel filed the return to petition for rehearing in the case of The State v. Ontario Makins with the Court of Appeals on September 30, 2019. On September 23 – 25, 2019, counsel attended the annual Public Defender Convention in Myrtle Beach, South Carolina. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Lawrence Postell with the Court of Appeals on September 18, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Antonio Fairey v. The State with this Court on September 16, 2019. Counsel had an oral argument before the Court of Appeals in the case of The State v. William Caughman on September 12, 2019. Counsel had an oral argument before the Court of Appeals in the case of Michael Elders v. The State on September 11, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Chad Stalnaker v. The State with this Court on September 5, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Susan Hendricks v. The State with this Court on August 30, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Mark Day with the Court of Appeals on August 27, 2019.

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

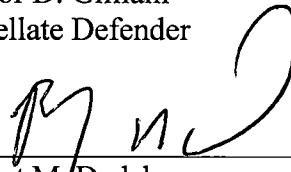
5. Counsel for the Attorney General's office has been informed of this request.

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,



Taylor D. Gilliam
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

October 30, 2019

Attorney for Petitioner

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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 Lindsey McCallister, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 30th day of October, 2019.



Taylor D. Gilliam
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 30th day
of October, 2019.

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