

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Lexington County
Brooks P. Goldsmith, Circuit Court Judge

ORIGINAL

STANLEY ALI GODBOLD,

PETITIONER,

RECEIVED

NOV 06 2013

S.C. SUPREME COURT

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2019-001114

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

Counsel for petitioner 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 petitioner 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 Anders brief of appellant and designation of matter in the case of The State v. Aaron Benjamin Beach in the Court of Appeals on November 1, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Glen K. LaConey v. The State in this Court on October 30, 2019. Counsel filed the petition for rehearing in the case of State v. Edward T. Chandler in the Court of Appeals on October 24, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of State v. James R. Rosenbaum in the Court of Appeals on October 16, 2019. Counsel filed the petition for rehearing in the case of State v. Ronald Yates Hyatt in the Court of Appeals on October 10, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Jamie Robinson in the Court of Appeals on October 2, 2019. Counsel filed the Anders brief of appellant and designation of matter in the case of The State v. Richez Markivious Bowser in the Court of Appeals on September 4, 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.

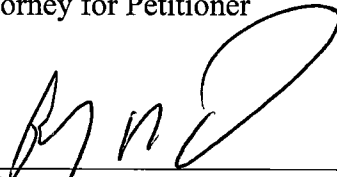
WHEREFORE, the undersigned counsel would respectfully request a thirty day extension, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Susan B. Hackett
Appellate Defender

Attorney for Petitioner



Robert M. Dudek
Chief Appellate Defender

This 6th day of November, 2019

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Lexington County
Brooks P. Goldsmith, Circuit Court Judge

STANLEY ALI GODBOLD,

PETITIONER,

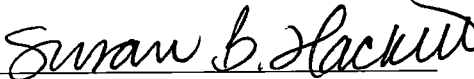
V.

STATE OF SOUTH CAROLINA,

RESPONDENT

CERTIFICATE OF SERVICE

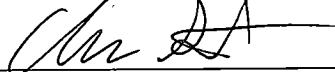
I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon Taylor Z. Smith, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 6th day of November, 2019.



Susan B. Hackett
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME
this 6th day of November, 2019.

 (L.S.)

Notary Public for South Carolina

My Commission Expires: September 30, 2029.