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S.C. SUPREME COURT

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Florence County

ORIGINAL

Honorable George M. McFaddin, Circuit Court Judge

JEFFERY THOMAS BROWN,

PETITIONER,

v.

STATE OF SOUTH CAROLINA

RESPONDENT

APPELLATE CASE NO. 2019-000709

PETITION FOR EXTENSION TO FILE
PETITION FOR WRIT OF CERTIORARI
AND ACCOMPANYING APPENDIX

The undersigned counsel respectfully requests a **final thirty-day extension, until January 2, 2020**, in which to file the petition for writ of certiorari and accompanying appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The petition for writ of certiorari and accompanying appendix in this case are due to be served and filed today.

2. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Tyquin Jenkins with the Court of Appeals on December 2, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Quantae Priest v. The State with the Supreme Court on November 25, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jeff Chestnut v. The State with the Supreme

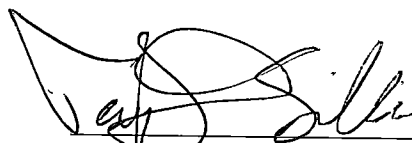
Court on November 12, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Joseph Brown with the Court of Appeals on November 4, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of John Hicks v. The State with the Supreme 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 the Supreme 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 the Supreme Court on October 7, 2019.

3. As indicated by her consent below, counsel for the state does not oppose this request.

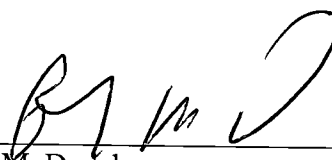
4. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty-day extension, until January 2, 2020**. Counsel respectfully requests that the time limits for filing the petition for writ of certiorari and accompanying appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,




Taylor D. Gilliam
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

December 2, 2019

I do not oppose:


For Lindsey McCallister, Esquire