

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Lexington County
Honorable Daniel E. Shearouse, Circuit Court Judge

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STANLEY ALI GODBOLD,

S.C. SUPREME COURT

PETITIONER,

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 OUT OF TIME

Pursuant to Rule 240, SCACR, Counsel for Stanley Ali Godbold respectfully requests the Court to accept the request for a third extension of time to file the petition for writ of certiorari in this case out of time. In support of this request, counsel shows the following:

- (1) The petition for writ of certiorari was due to be filed with this Court on December 6, 2019. The time in which to file the petition for writ of certiorari has been previously extended twice.
- (2) Due to a clerical error, the third extension was not timely filed.
- (3) Undersigned counsel advised Mr. Taylor Z. Smith, of the Attorney General's Office, of her intention to file this motion to ask this Court to accept the request for an extension of time in which to file the petition for writ of certiorari out of time. Mr. Smith indicated that he consents to this motion.

(4) Counsel for Stanley Ali Godbold respectfully requests a **final thirty (30) day extension, until January 6, 2020**, 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:

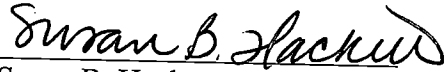
(5) Counsel for Stanley Ali Godbold respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions previously granted and the order in which counsel attempts to manage his caseload, counsel hopes that no further extension requests will be required.

(6) Counsel filed the petition for rehearing in the case of State v. Gregory Brooks in the Court of Appeals on December 5, 2019. Counsel filed the Anders brief of appellant and designation of matter in the case of The State v. Dontarious Jaron Wright in the Court of Appeals on November 27, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Shannon Earl Garland in the Court of Appeals on November 20, 2019. 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. (7) Counsel makes this request in good faith and not for purpose of delay.

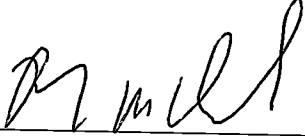
(8) Counsel for the Attorney General's office consents to this request as shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until January 6, 2020**, 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,

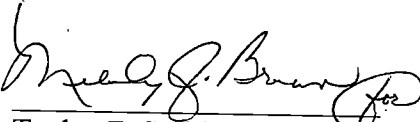

Susan B. Hackett
Appellate Defender

Attorney for Petitioner.


Robert M. Dudek
Chief Appellate Defender

This 12th day of December, 2019.

I consent:


Taylor Z. Smith, Esquire