

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

ORIGINAL

Certiorari to Lexington County
Honorable Walton J. McLeod, IV, Circuit Court Judge

BILAL S. HAYNESWORTH,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2019-001249

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.

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S.C. SUPREME COURT

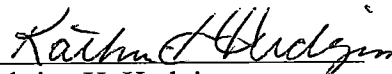
3. Counsel filed the brief of appellant pursuant to White v. State in the case of Leroy Glover, Jr. v. The State of South Carolina with the Supreme Court on January 9, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Leroy Glover, Jr. The State of South Carolina with the Supreme Court on January 9, 2020. Counsel filed the petition for rehearing in the case of Brandon Heath Clark v. The State of South Carolina with the Court of Appeals on December 27, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Sandy Lee Locklear v. The State of South Carolina with the Supreme Court on December 23, 2019. Counsel filed the Anders brief of appellant and designation of matter in the case of The State of South Carolina v. Tristian Cummings with the Court of Appeals on December 20, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jerry Dean Heard v. The State of South Carolina with the Supreme Court on December 4, 2019. Counsel filed the Anders brief of appellant and designation of matter in the case of The State of South Carolina v. Keshawn Melvin Rice with the Court of Appeals on December 4, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Tyrone Joseph Whatley v. The State of South Carolina with the Supreme Court on November 7, 2019.

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

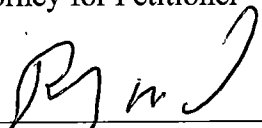
5. Counsel for the Attorney General's office has been informed of this request.

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,


Kathrine H. Hudgins
Appellate Defender

Attorney for Petitioner


Robert M. Dudek
Chief Appellate Defender

This 15th day of January, 2020

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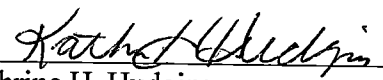
V.

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 15th day of January, 2020.


Kathrine H. Hudgins
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME
this 15th day of January, 2020.


_____(L.S.)
Notary Public for South Carolina
My Commission Expires: September 30, 2029.