

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Appeal from Lexington County
Walton J. McLeod, IV, Circuit Court Judge

WORTH EDWARD COOK,

V.

THE STATE,

ORIGINAL
RECEIVED
FEB 07 2020
PETITIONER,
S.C. SUPREME COURT

RESPONDENT.

APPELLATE CASE NO. 2019-001248

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

Counsel for Worth Edward Cook respectfully requests a **final thirty (30) day extension, until March 9, 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:

1. The Petition for Writ of Certiorari and Appendix are due to be served and filed with the Court today. The Court has granted counsel two previous extensions.
2. Counsel for Worth Edward Cook 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 is preparing and consulting with Chief Appellate Defender, Robert M. Dudek, on the initial brief of appellant and designation of matter in the case of The State v. Richard Douglas Waldrup, which she plans to file with the Court of Appeals in the upcoming weeks, and on the petition for writ of certiorari and accompanying appendix in the cases of Booker T. Hill v. The State and Sheldon Huger v. The State, which she plans to file with this Court in the upcoming weeks. Counsel filed the Anders brief of appellant and designation of matter in the case of The State v. Jamaa Ato Washington, Jr., with the Court of Appeals on February 3, 2020. Counsel, along with co-counsel Robert M. Dudek, filed the initial brief of appellant and designation of matter in the case of The State v. Carmie Josette Nelson with the Court of Appeals on January 31, 2020.

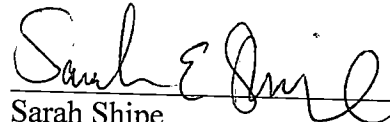
4. Counsel makes this request in good faith and not for purpose of delay.

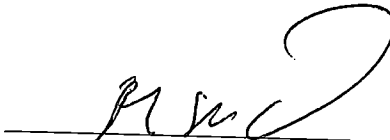
5. Counsel for the Attorney General's office has been informed of this request as shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until March 9, 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 for Writ of Certiorari and Appendix be held in abeyance pending a ruling on this motion.

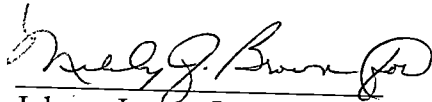
This 7th day of February, 2020.

Respectfully submitted,


Sarah Shipe
Appellate Defender


Robert M. Dudek
Chief Appellate Defender

I consent:


Johnny James, Jr., Esquire