

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Beaufort County

William H. Seals, Circuit Court Judge

ORIGINAL

JAMES TYTIL WRIGHT,

RECEIVED
PETITIONER,

FEB 14 2020

v.

STATE OF SOUTH CAROLINA,

S.C. SUPREME COURT

RESPONDENT.

APPELLATE CASE NO. 2019-001663

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

Counsel for James Tytil Wright 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 James Tytil Wright respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the

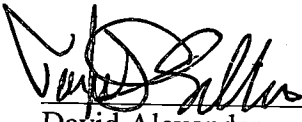
number of extensions previously granted and the order in which counsel attempts to manage his caseload, counsel hopes that no further extension requests will be required.

3. Counsel had an oral argument in the case of The State v. Robin Renee Herndon, before the Supreme Court on February 12, 2020. Counsel filed the initial brief of appellant and record on appeal in the case of The State v. Harlin A. Bearden with the Court of Appeals on February 5, 2020. Counsel filed the initial brief of appellant and record on appeal in the case of The State v. Tony Dequan Manago with the Court of Appeals on January 23, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Michael Sullivan with the Court of Appeals on January 8, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Rias Odell Isaac with the Court of Appeals on December 13, 2019. Counsel filed the initial brief of appellant and record on appeal in the case of In the Matter of the Care and Treatment of Timothy Brown with the Court of Appeals on December 9, 2019. Counsel filed the initial brief of respondent and designation of matter in the case of The State v. Corey Jermaine Brown with the Court of Appeals on December 4, 2019.

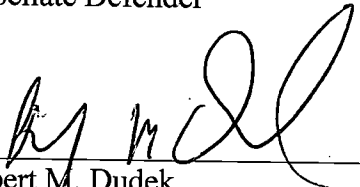
4. Counsel makes this request in good faith and not for purpose of delay.
5. Counsel for the Attorney General's office has been informed of this request.

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 for writ of certiorari and appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,

for 

David Alexander
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 14th day of February, 2020.

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Appeal from Beaufort County

William H. Seals, Circuit Court Judge

JAMES TYTIL WRIGHT,

PETITIONER,

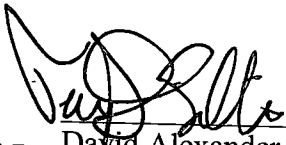
V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

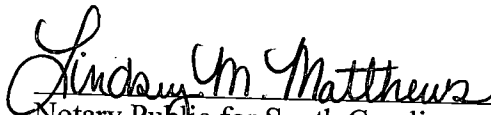
CERTIFICATE OF SERVICE

I certify that a copy of the Motion for an Extension of Time in which to file the petition for writ of certiorari and appendix in the above referenced case has been served upon Sara Gunton, Esquire, at the Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia SC, 29201, this 14th day of February, 2020.

for 
David Alexander
Appellate Defender

ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me
this 14th day of February, 2020.

 (L.S.)
Notary Public for South Carolina
My Commission Expires: October 22, 2024.