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S.C. SUPREME COURT

ORIGINAL

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Beaufort County

Honorable William H. Seals, Circuit Court Judge

JAMES TYTIL WRIGHT,

PETITIONER,

V.

STATE OF SOUTH CAROLINA

RESPONDENT

APPELLATE CASE NO. 2019-001663

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

The undersigned counsel respectfully requests a **final thirty-day extension, until April 15, 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 brief of appellant and record on appeal In the Matter of the Care and Treatment of James Williams with the Court of Appeals on March 13, 2020. Counsel filed the brief of appellant and record on appeal in the case of The State v. Antonio Deaunte Simpkins with the Court of Appeals on February 26, 2020. Counsel filed the brief of respondent in the case of The State v. John Kenneth Massey with the Supreme Court on February 20, 2020. Counsel had an oral

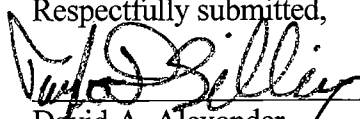
argument in the case of The State v. Robin Renee Herndon, before the Supreme Court on February 12, 2020. Counsel filed the brief of appellant and record on appeal in the case of The State v. Harlin A. Bearden with the Court of Appeals on February 5, 2020. Counsel filed the brief of appellant in the case 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.

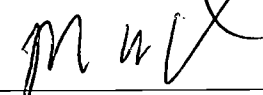
3. As indicated by her consent below, counsel for the state does not oppose this request.

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.

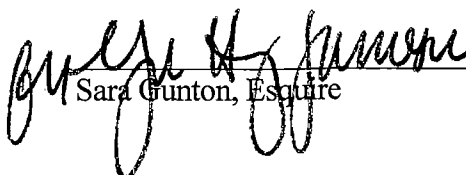
WHEREFORE, the undersigned counsel would respectfully request a **final thirty-day extension, until April 15, 2020**. Counsel respectfully requests that the time limits for filing the petition for writ of certiorari and accompanying appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,

for 
David A. Alexander
Appellate Defender


Robert M. Dudek
Chief Appellate Defender

March 16, 2020
I do not oppose:


Sara Grunton, Esquire