

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Charleston County

Honorable Michael G. Nettles, Circuit Court Judge

ORIGINAL

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MAR 19 2020

GERALD CORNELL GREEN,

PETITIONER, S.C. SUPREME COURT

V.

STATE OF SOUTH CAROLINA

RESPONDENT

APPELLATE CASE NO. 2019-001755

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 petition for writ of certiorari to the Court of Appeals in the case of John Willie Mack v. The State on March 3, 2020 with the Supreme Court. Counsel filed the petition for writ of certiorari in the case of Devatee Clinton v. The State on March 3, 2020 with the Supreme Court. Counsel filed the petition for writ of certiorari in the case of Terry Cooper v. The State on February 3, 2020 with the Supreme Court. Counsel filed the petition for writ of


certiorari in the case of Keishawn McManus v. The State on January 6, 2020 with the Supreme Court. Counsel filed the petition for rehearing in the case of The State v. John Mack with the Court of Appeals on January 2, 2020. Counsel filed the petition for writ of certiorari in the case of David Mooney v. The State on January 2, 2020 with the Supreme Court.

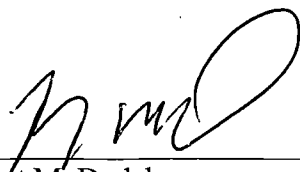
3. As indicated by her consent below, counsel for the state does not oppose this request.

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.

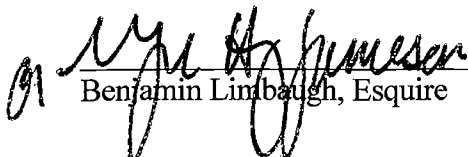
WHEREFORE, the undersigned counsel would respectfully request a **final thirty-day extension, until April 15, 2020**. Counsel respectfully requests that the time limits for filing the petition for writ of certiorari and accompanying appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,

for   
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Jessica M. Saxon  
Appellate Defender

  
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Robert M. Dudek  
Chief Appellate Defender

March 16, 2020  
I do not oppose:

  
\_\_\_\_\_  
Benjamin Linbaugh, Esquire