

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Appeal from Richland County
J. Derham Cole, Circuit Court Judge

RECEIVED

May 13 2020

S.C. SUPREME COURT

FAASIU TOESE,

PETITIONER,

V.

THE STATE,

RESPONDENT.

APPELLATE CASE NO. 2019-001738

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

Counsel for Faasiu Toese 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 Faasiu Toese 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 filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Candice R. Beasley v. The State with this Court on May 4, 2020. Counsel filed the petition for writ of certiorari and accompanying appendices in the case of Curtis T. Johnson v. The State with this Court on April 15, 2020. Counsel filed the Anders brief of appellant and designation of matter in the case of The State v. Richard Douglas Waldrup with the Court of Appeals on April 2, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Booker T. Hill v. The State with this Court on March 11, 2020. Counsel had an oral argument before the Court of Appeals on March 10, 2020 in the case of The State v. Jermaine Marquel Bell.

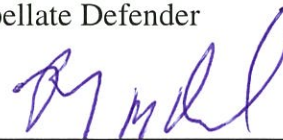
4. Counsel makes this request in good faith and not for purpose of delay.

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,

s/ Sarah E. Shipe
Sarah Shipe
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 13th day of May, 2020.