

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Chesterfield County
Brooks P. Goldsmith, Circuit Court Judge

RECEIVED

Jun 22 2020

S.C. SUPREME COURT

WILLIAM S. PEGUES,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2019-002007

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

The undersigned counsel respectfully requests a thirty-day extension from **Tuesday, June 23, 2020, to July 23, 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 Tuesday, June 23, 2020.

2. Counsel filed the brief of appellant and designation of matter in the murder case of The State v. Brian David Walls with the Court of Appeals on June 18, 2020. Counsel also is working on the brief, and he expects to file the initial brief of appellant and designation of matter in

the murder case of The State v. Malette Denise Kimbrough with the Court of Appeals on or before Tuesday, June 23, 2020. Counsel is also lead counsel on the death penalty cases of State v. Timothy Jones, Jr., out of Lexington County, and The State v. Jerome Jenkins, Jr. out of Horry County. Counsel had a WebEx oral argument before the Court of Appeals on June 3, 2020 in The State v. John Ernest Perry. Counsel filed the brief of appellant and designation of matter in the case of The State v. Gabriel Joyner with the Court of Appeals on May 29, 2020. Counsel had a WebEx oral argument before the Court of Appeals on May 27, 2020 in The State v. James Caleb Williams. Counsel had a WebEx oral argument before the Court of Appeals on May 5, 2020 in The State v. Howard James Woods, Jr. Counsel filed a petition for writ of certiorari to the Court of Appeals and accompanying appendix in The State v. Edward Primo Bonilla, with this Court on May 4, 2020. Counsel filed the petition for rehearing in the case of The State v. Justin Jamal Warner with the Court of Appeals on April 22, 2020. **Counsel has extensive administrative duties as the Chief Appellate Defender, including Appellate Project oversight duties and management of the work from home personnel during this coronavirus pandemic. Counsel also has to discuss the cases of four inexperienced Appellate Defenders with them in advance, and read all of their filings in advance. Counsel regrets the necessity of this extension request, but it is absolutely necessary under the circumstances.**

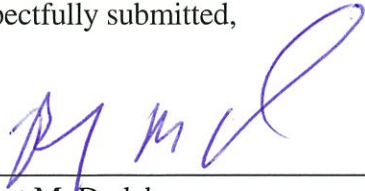
3. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

4. Opposing counsel, the Attorney General's Office, has graciously consented to this extension request by way of the extended thirty-day general consent granted by Deputy Attorney

General Donald J. Zelenka for all Appellate Defense extensions through June 30, 2020. That extended, emailed general consent was dated May 20, 2020.

WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension from Tuesday, June 23, 2020 to July 23, 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,



Robert M. Dudek
Chief Appellate Defender

This 22nd day of June, 2020