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S.C. SUPREME COURT

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Laurens County

Honorable L. Casey Manning, Circuit Court Judge

TITO O. MARIN,

PETITIONER,

V.

STATE OF SOUTH CAROLINA

RESPONDENT

APPELLATE CASE NO. 2019-002025

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

Counsel for Tito O. Marin 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 Tito O. Marin 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 will file the petition for writ of certiorari in the case of Rashad Johnson v. The State today with the Supreme Court. Counsel filed the return petition for writ of certiorari in the case of Marie Faltas v. The State on July 9, 2020 with the Supreme Court. Counsel filed the petition for writ of certiorari in the case of Danielle Peay v. The State on July 1, 2020 with the Supreme Court. Counsel filed the initial brief of appellant in the case of The State v. Amy Taylor on June 15, 2020 with the Court of Appeals. Counsel filed the petition for writ of certiorari in the case of Christian Rollins v. The State on June 9, 2020 with the Supreme Court. Counsel filed the petition for writ of certiorari in the case of Sylvester Johnson v. The State on June 9, 2020 with the Supreme Court. Counsel filed the petition for writ of certiorari in the case of Dashon Garner v. The State on May 26, 2020 with the Supreme Court. Counsel filed the petition for writ of certiorari in the case of John Haynes v. The State on May 14, 2020 with the Supreme Court. Counsel filed the petition for writ of certiorari in the case of Gerald Green v. The State on May 5, 2020 with the Supreme Court.

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

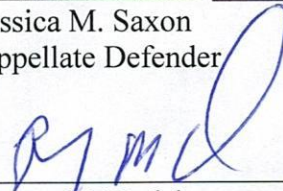
5. Counsel for the Attorney General's office has been informed of this request via electronic mail.

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 be held in abeyance pending a ruling on this motion.

Respectfully submitted,

s/Jessica M. Saxon

Jessica M. Saxon
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

Attorney for Petitioner

July 22, 2020

