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S.C. SUPREME COURT

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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Certiorari to Chesterfield County

Brooks P. Goldsmith, Circuit Court Judge

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WILLIAM S. PEGUES,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2019-002007

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

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The undersigned counsel respectfully requests a **final thirty-day extension from Thursday July 23, 2020 until August 24, 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 Thursday, July 23, 2020.

2. Counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in The State v. Justin Jamal Warner with this Court on July 20, 2020.

Counsel filed the initial brief of appellant and designation of matter in the death penalty case of The

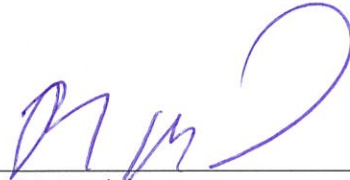
State v. Jerome Jenkins, Jr. with this Court on July 13, 2020 with co-counsel Kathrine Hudgins and Adam Ruffin. Counsel filed the petition for rehearing in the case of The State v. Arsenio D. Colclough with the Court of Appeals on June 25, 2020. Counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in The State v. Timiya Rashad Massey with this Court on June 24, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Malette Denise Kimbrough with the Court of Appeals on June 23, 2020. Counsel filed the brief of appellant and designation of matter in the case of The State v. Brian David Walls with the Court of Appeals on June 18, 2020. 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 has extensive administrative duties as the Chief Appellate Defender, including administrative and Appellate Project oversight, and training four less experienced appellate defenders and reviewing all their filings in advance.**

3. 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 July 31, 2020. That extended, emailed general consent was dated June 23, 2020.

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.

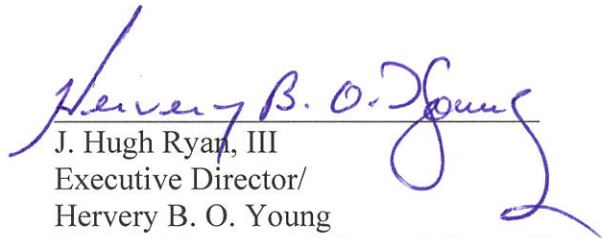
WHEREFORE, the undersigned counsel would respectfully request a **final thirty-day extension from Thursday July 23, 2020 until August 24, 2020**, in which to file the petition for writ of certiorari and accompanying appendix. Counsel respectfully requests that the time limits for filing the petition for writ of certiorari and accompanying appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



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Robert M. Dudek  
Chief Appellate Defender



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J. Hugh Ryan, III  
Executive Director/  
Hervey B. O. Young  
Deputy Director and General Counsel/  
W. Lawrence Brown  
Deputy General Counsel and Training  
Director

This 22<sup>nd</sup> day of July, 2020