

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

RECEIVED

Aug 12 2020

Certiorari to Richland County
Honorable Diane S. Goodstein, Circuit Court Judge

S.C. SUPREME COURT

IBN GADSON,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2019-001855

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

Counsel for petitioner 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 petitioner 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 petition for rehearing in the case of Steven Barnes v. The State of South Carolina with the Court of Appeals on August 6, 2020. Counsel filed the petition for rehearing in the case of Johnathan Green v. The State of South Carolina with the Court of Appeals on August 5, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Earnest Allen v. The State of South Carolina with this Court on July 16, 2020. Counsel filed the brief of petitioner in the case of The State of South Carolina v. Timothy L. Frady with the Court of Appeals on July 16, 2020. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of Brenda Roberts v. The State of South Carolina with this Court on June 29, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Antonio Emerson Tate v. The State of South Carolina with this Court on June 11, 2020. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Gerry Brent James v. The State of South Carolina with this Court on June 3, 2020.

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

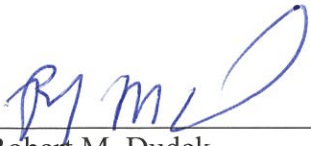
5. Opposing counsel, the Attorney General's Office, has graciously consented to this extension request by way of the thirty day general consent granted by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through August 31, 2020. That emailed general consent was dated July 30, 2020.

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,



Kathrine H. Hudgins
Appellate Defender
Attorney for Petitioner



Robert M. Dudek
Chief Appellate Defender

This 12th day of August, 2020