

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Richland County

Honorable Brian M. Gibbons, Circuit Court Judge

RECEIVED

Aug 17 2020

S.C. SUPREME COURT

GERALD BERNARD HALTIWANGER,

PETITIONER,

V.

STATE OF SOUTH CAROLINA

RESPONDENT

APPELLATE CASE NO. 2020-000361

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

Counsel for Gerald Bernard Haltiwanger 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 Gerald Bernard Haltiwanger 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 his caseload, counsel hopes that no further extension requests will be required.

3. Counsel filed the return to petition for writ of certiorari to the court of appeals in the case of Michael Elders v. The State with the Supreme Court on August 10, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Miranda Taylor with the Court of Appeals on August 7, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Glen Waldrop with the Court of Appeals on July 27, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Ronnie Bonner with the Court of Appeals on July 27, 2020. Counsel filed the brief of respondent in the case of The State v. Ontario Makins with the Supreme Court on July 2, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Yolanda Shatten with the Court of Appeals on June 25, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Michael Strother with the Court of Appeals on June 25, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Risheen Rich with the Court of Appeals on June 25, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Quincy McCants v. The State with the Supreme Court on June 22, 2020.

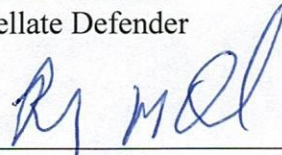
4. Counsel makes this request in good faith and not for purpose of delay.

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/Taylor D. Gilliam
Taylor D. Gilliam
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

Attorney for Petitioner

August 17, 2020