

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Anderson County

R. Scott Sprouse, Circuit Court Judge

RECEIVED

Sep 21 2020

S.C. SUPREME COURT

ROBERT FROST,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2020-000604

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

The undersigned counsel respectfully requests a thirty-day extension **from September 21, 2020 until October 21, 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 today, September 21, 2020.

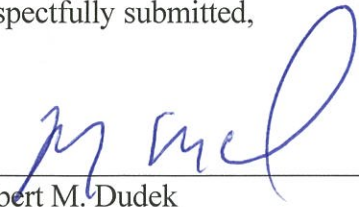
2. Counsel is lead counsel and is presently working on *the death penalty case of State v. Timothy Jones Jr*, where the transcripts are 7,422 pages long. Eight meritorious issues are being briefed, and this brief and designation of matter is expected to be filed with this Court before the end of this month. Counsel filed the brief of appellant and designation of matter in the case of The State

v. Heirberone Heava Foster with the Court of Appeals on August 31, 2020. Counsel filed the petition for rehearing in case of The State v. Deshanndon Markelle Franks with the Court of Appeals on August 27, 2020. Counsel filed the brief of appellant and designation of matter in the case of The State v. William Derek Bennon with the Court of Appeals on August 21, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of William S. Pegues v. The State with this Court on August 21, 2020. Counsel filed the brief of appellant and designation of matter in the case of The State v. Jason Carlton Booth with the Court of Appeals on July 27, 2020. Counsel filed the Brief of Respondent in the case of The State v. Joseph Bowers with this Court on July 22, 2020. **Counsel has extensive administrative duties as the Chief Appellate Defender, including administrative and Appellate Project oversight, and training three less experienced appellate defenders and reviewing all their filings in advance.**

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.

WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension. 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 21st day of September, 2020