

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Spartanburg County

J. Derham Cole, Circuit Court Judge

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**RECEIVED**

**Dec 02 2020**

S.C. SUPREME COURT

ANDRES ANTONIO TORRES,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2020-000842

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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 thirty-day extension from December 2, 2020 until January 1, 2021, 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:

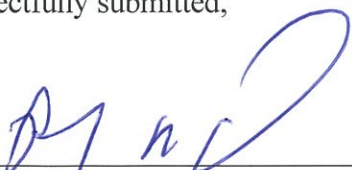
1. The petition for writ of certiorari and accompanying appendix in this case are due to be served and filed today, December 2, 2020.
2. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Robert Frost v. The State with this Court on November 20, 2020. Counsel had an oral argument before this Court on November 17, 2020 in The State v. Ahshaad Mykiel Owens.

Counsel filed the brief of appellant and designation of matter in the case of The State v. Robert Wayne Eaves with the Court of Appeals on November 13, 2020. Counsel filed the initial brief of appellant and designation of matter in the death penalty case of The State v. Timothy Ray Jones, Jr. with this Court on October 23, 2020 with co-counsel Susan Hackett, David Alexander, Lara Caudy, and Taylor Gilliam. Counsel filed the petition for rehearing in case of The State v. Stewart Jerome Middleton with the Court of Appeals on October 15, 2020. **Counsel has missed a not inconsiderable amount of time from work in the last two months due to illness, doctor appointments, and a visit with a specialist. Counsel has extensive administrative duties as the Chief Appellate Defender, including administrative and Appellate Project oversight, management of the work from home personnel during this coronavirus pandemic, 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 from December 2, 2020 until January 1, 2021. 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

December 2, 2020