

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

RECEIVED
Jun 24 2022

Certiorari to Richland County

S.C. SUPREME COURT

Honorable L. Casey Manning, Circuit Court Judge

GARY A. WHITE,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2021-001270

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

The undersigned counsel respectfully requests a **final ten-day extension, from June 24th, 2022 until July 5, 2022**, 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, June 24, 2022, having been extended by three prior orders of this Court.

2. **Counsel for Gary A. White respectfully submits that due to illness she cannot come into the office to complete this petition for writ of certiorari as expected. Counsel respectfully submits that this constitutes an extraordinary circumstance warranting the granting of this additional limited extension of time. Counsel regrets the necessity of asking**

for this extension but an unexpected illness mandates this request. 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.

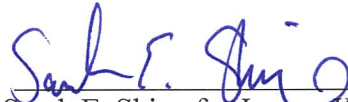
3. Counsel filed the Brief of Petitioner in the case of The State v. Jon Paul Smart with the Supreme Court on June 17, 2022. Counsel filed the Petition for Rehearing in the case of The State v. Ronald Brown with the Court of Appeals on June 17, 2022. Counsel filed the Initial; Brief of Appellant and Designation of Matter in the case of The State v. Terry Gerrard Gridine with the Court of Appeals on June 10, 2022. Counsel appeared before the Court of Appeals for Oral Argument in the case of Terrance Goss v. The State on June 8, 2022. Counsel appeared before the Court of Appeals for Oral Argument in the case of Wanda Crumpton v. The State on June 7, 2022. Counsel filed the Petition for Writ of Certiorari to the Court of Appeals in the case of The State v. Eric Emanuel English with the Supreme Court of June 3, 2022. Counsel filed the Petition for Rehearing in the case of Richard K. Galloway v. The State with the Court of Appeals on May 5, 2022. Counsel filed the Petition for Writ of Certiorari in the case of Frank Muns v. The State with the Supreme Court on April 28, 2022. Counsel filed the Petition for Rehearing in the case of The State v. Eric Emanuel English with the Court of Appeals on April 21, 2022.

4. 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 June 30, 2022. That extended, emailed general consent was dated May 31, 2022.

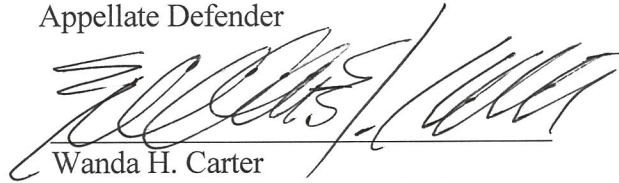
5. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

WHEREFORE, the undersigned counsel would respectfully request a **final ten-day extension, from June 24, 2022 until June 30, 2022**, 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.

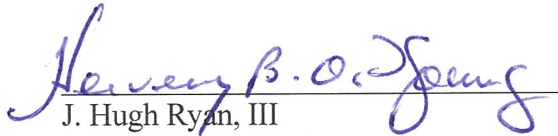
Respectfully submitted,



Sarah E. Shipe for Joanna K. Delany
Appellate Defender



Wanda H. Carter
Deputy Chief Appellate Defender
for Robert M. Dudek Chief Appellate Defender



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

This 24th day of June, 2022.