

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

**RECEIVED**  
**Jun 24 2022**  
S.C. SUPREME COURT

\_\_\_\_\_  
Certiorari to Spartanbury County

Honorable William A. McKinnon, Circuit Court Judge

\_\_\_\_\_  
COREY BROWN,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2021-001347

\_\_\_\_\_  
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 24, 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 Corey Brown 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.

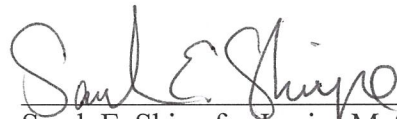
3. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Holly Jo Thompson v. The State with the South Carolina Supreme Court on June 13, 2022. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Worth Edward Cook, III v. The State with the Court of Appeals on June 7, 2022. Counsel filed the Anders Brief of Appellant and Designation of Matter in the case of The State v. Quatase J. Jenrette with the Court of Appeals on June 6, 2022. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Michael A. Williams with the Court of Appeals on May 25, 2022. Counsel appeared before the Court of Appeals for Oral Argument in the case of The State v. Amy N. Taylor on May 12, 2022. Counsel filed the Johnson Petition for Writ of Certiorari and Appendix in the case of Jaysen R. Hodge v. The State with the Supreme Court on May 9, 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.

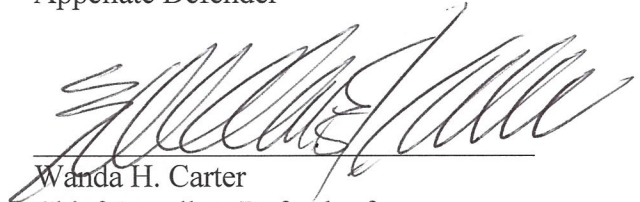
5. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

WHEREFORE, the undersigned counsel would respectfully request a **final ten-day extension, from June 24, 2022 until July 5, 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.

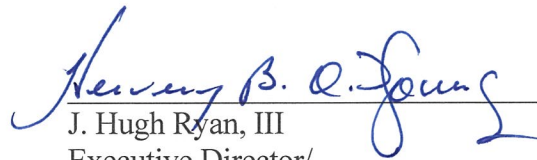
Respectfully submitted,



Sarah E. Shipe for Jessica M. Saxon  
Appellate Defender



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



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

This 24th day of June, 2022.