

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Appeal from Beaufort County

Honorable Maite Murphy, Circuit Court Judge

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Lower Court Case No. 2014-CP-07-02994  
Appellate Case No. 2019-000529

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Abdiyyah ben Alkebulanyahh, #6012  
a/k/a Tyree Roberts,

V.

State of South Carolina,

**RECEIVED**

**Nov 07 2022**

S.C. SUPREME COURT

PETITIONER,

RESPONDENT.

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SECOND MOTION FOR EXTENSION OF TIME

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Petitioner, through undersigned counsel, respectfully requests the Court grant an extension of time in which to serve and file his brief, currently due to be filed on November 14, 2022. Specifically, undersigned counsel requests an additional thirty (30) days in which to file his brief. In support of this motion, the undersigned would show this Court:

- (1) This Court granted Petitioner's first extension request on October 10, 2022, extending the deadline to file and serve the brief until November 14, 2022.
- (2) Since this Court granted the first extension request, undersigned counsel has had significant obligations in other cases in which she is appointed as counsel.

- (3) Undersigned counsel spent significant time preparing and filing Respondents-Appellants' Initial Reply Brief and final briefs in *Owens v. Stirling*, No. 2022-001280, which is currently pending in this Court for consideration of the constitutionality of South Carolina's recently amended execution methods statute.
- (4) Undersigned counsel also spent significant time preparing for an evidentiary hearing in the capital post-conviction relief case of *Blackwell v. State*, No. 2018-CP-42-00928, which was scheduled for October 31, 2022. On October 14, 2022, the State requested a continuance of the evidentiary hearing, requiring undersigned counsel to draft and file a response on October 17, 2022 and appear at a hearing on the continuance on October 19, 2022. The hearing was ultimately continued until March 2023.
- (5) Undersigned counsel also drafted and filed pretrial motions in *United States v. Seward*, No. 4:20-cr-00512-DCC (D.S.C.), a federal murder case, on November 1, 2022.
- (6) Undersigned counsel contacted counsel for the State who do not oppose this request.

For the above reasons, which counsel believes constitute good cause under this Court's Order Dated March 18, 2009, undersigned counsel requests that this Court extend the deadline for filing the Petition for Writ of Certiorari and Appendix in this case an additional thirty (30) days.

Respectfully submitted,

s/ Lindsey S. Vann  
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November 6, 2022.