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Nov 09 2022
SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Colleton County

H. Robert J. Bonds, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

WILLIAM C. SANDERS,

APPELLANT

APPELLATE CASE NO. 2021-001536

MOTION FOR AN EXTENSION OF TIME TO
SERVE AND FILE THE INITIAL BRIEF OF APPELLANT
AND DESIGNATION OF MATTER

Counsel for appellant respectfully requests a **fourth and final thirty (30) day extension from November 9, 2022, until December 9, 2022**, in which to serve and file the Initial Brief of Appellant and Designation of Matter in the above-referenced case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. This is a fourth request for an extension. In support of this request, counsel shows:

1. The Initial Brief of Appellant and Designation of Matter in this case are due to be served and filed with the Court today.
2. Counsel for appellant respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. 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. On November 10, 2022, counsel will file the initial brief of appellant in In the Matter of the Care and Treatment of Shawn Dailey with the Court of Appeals. On November 9, 2022, counsel will file the brief of respondent in The State v. Montrelle Campbell with the Supreme Court. On November 3, 2022, counsel, along with co-counsel, filed the brief of petitioner in Marion Alexander Lindsey v. The State with the Supreme Court. On October 19, 2022, counsel filed the initial brief of appellant and designation of matter in The State v. Sebastian Dominic Kaisk with the Court of Appeals. On October 5, 2022, counsel filed the brief of petitioner in The State v. Stacardo Grissett with the Supreme Court. On September 28, 2022, counsel filed the brief of petitioner in Michael Orlando Brown v. The State with the Court of Appeals. On September 28, 2022, counsel filed the brief of petitioner in Keith Denver Tate v. The State with the Court of Appeals. From September 19, 2022 through September 21, 2022, counsel attended the Annual Public Defender Conference in Myrtle Beach. On September 15, 2022, counsel had an oral argument in The State v. Nyquan Brown before the Court of Appeals. On September 14, 2022, counsel had an oral argument in The State v. Russell Levon Johnson before the Supreme Court. On September 7, 2022, counsel filed the initial brief of appellant and designation of matter in The State v. Paulette Sims with the Court of Appeals.

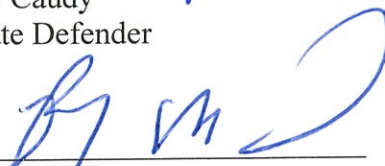
4. On November 1, 2022, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through November 30, 2022.

WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension from November 9, 2022, until December 9, 2022**, in which to serve and file the Initial Brief of Appellant and Designation of Matter in this case based upon the above exigent circumstances.

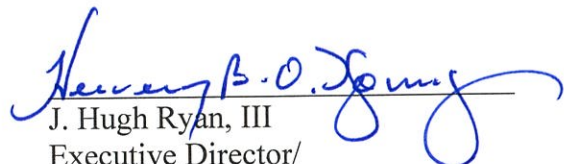
Respectfully submitted,



Lara M. Caudy
Appellate Defender



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 9th day of November, 2022.

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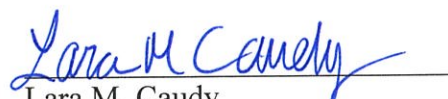
WILLIAM C. SANDERS,

APPELLANT

APPELLATE CASE NO. 2021-001536

CERTIFICATE OF SERVICE

Pursuant to Rule 262(a)(3) and Rule 262(c)(3), SCACR, the undersigned hereby certifies a true copy of the Motion for Extension in the above-referenced case has been served upon William M. Blich, Jr., Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), this 9th day of November, 2022.



Lara M. Caudy
Appellate Defender

ATTORNEY FOR APPELLANT

From: [Leverett, Scott](#)
To: [SC - BLITCH WILLIAM](#)
Cc: [SC - COLLINS CAROLINE](#); [Caudy, Lara](#)
Subject: William C. Sanders - Extension 4 - Appellate Case No. 2021-001536
Date: Wednesday, November 9, 2022 10:42:00 AM
Attachments: [William C. Sanders - Extension 4 - Appellate Case No. 2021-001536.pdf](#)

Dear Mr. Blitch,

Attached please find a copy of the fourth extension in the above referenced case that is being filed today, November 9, 2022, with the Court of Appeals.

-Scott Leverett
Admin. Asst. for Lara Caudy
Appellate Defense