

RECEIVED

Dec 14 2022

S.C. SUPREME COURT

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Lexington County

R. Lawton McIntosh, Circuit Court Judge

LANCE LEON MILES,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2022-000821

MOTION FOR AN EXTENSION TO FILE
THE PETITION FOR WRIT OF CERTIORARI
AND APPENDIX

Counsel for petitioner respectfully requests a **final thirty (30) day extension, until January 13, 2023**, in which to file the Petition for Writ of Certiorari and Appendix in this case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. This is a third request for an extension. In support of this request, counsel shows:

1. The Petition for Writ of Certiorari and Appendix are due to be served and filed with the Court today. The Court has granted counsel two previous extensions.
2. Counsel for petitioner 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.

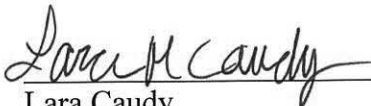
3. On December 13, 2022, counsel filed the petition for writ of certiorari and accompanying appendix in Mark Lorenzo Blake v. The State with the Supreme Court. On December 5, 2022, counsel had an oral argument in Dominic Leggette v. The State before the Court of Appeals. On November 30, 2022, counsel filed the initial brief of appellant and designation of matter in The State v. William Cornelius Sanders with the Court of Appeals. On November 10, 2022, counsel filed the initial brief of appellant and designation of matter in In the Matter of the Care and Treatment of Shawn Torlif Daily with the Court of Appeals. On November 9, 2022, counsel filed the brief of respondent in The State v. Montrelle Lamont 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.

4. Counsel makes this request in good faith and not for purpose of delay.

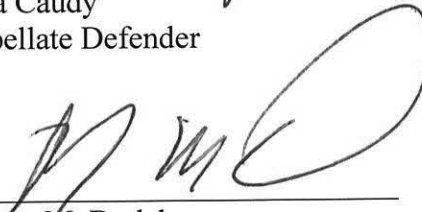
5. On November 29, 2022, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through December 31, 2022.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until January 13, 2023**, in which to file the Petition for Writ of Certiorari and Appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the Petition for Writ of Certiorari and Appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Lara Caudy
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 14th day of December, 2022.

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Lexington County

R. Lawton McIntosh, Circuit Court Judge

LANCE LEON MILES,

PETITIONER,


V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

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 an Extension to File the Petition for Writ of Certiorari and Appendix in the above-referenced case has been served upon Taylor Z. Smith, Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), this 14th day of December, 2022.


Lara Caudy
Appellate Defender

ATTORNEY FOR APPELLANT