

**RECEIVED**  
**Dec 19 2022**  
**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from York County

William A. McKinnon, Circuit Court Judge

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THE STATE,

RESPONDENT,

V.

TERRY SHAIMEK TYLER,

APPELLANT.

APPELLATE CASE NO. 2021-001316

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

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Counsel for Terry Shaimék Tyler respectfully requests a thirty (30) day extension from December 19, 2022 until January 18, 2023, in which to serve and file the Initial Brief of Appellant and Designation of Matter 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 Initial Brief of Appellant and Designation of Matter in this case are due to be served and filed today.

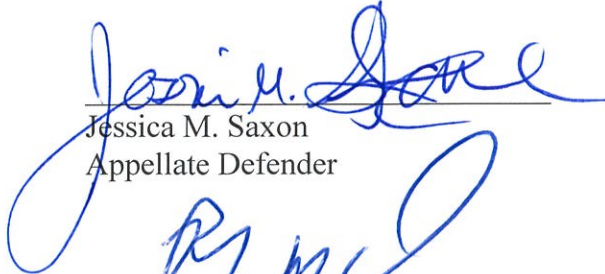
2. Counsel filed the Petition for Certiorari to the Court of Appeals and the Appendix in the case of The State v. Amy N. Taylor with the Supreme Court on December 6, 2022. Counsel filed the Petition for Writ of Certiorari and the Appendix in the case of Toaby Alexander Trapp v. The State with the Supreme Court on November 18, 2022. Counsel filed the Brief of Appellant and Record on Appeal in the case of Michael A. Williams v. The State with this Court on November 9, 2022. Counsel filed the Petition for Rehearing in the case of Michael Edward Williams v. The State with this Court on November 8, 2022. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Terbias Jerrod Goff with this Court on November 7, 2022.

3. 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.

4. 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.

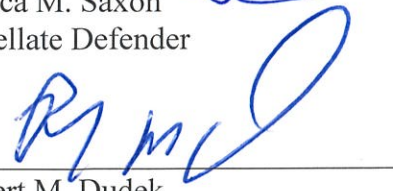
WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension from December 19, 2022 until January 18, 2023. Counsel respectfully requests that the time limits for filing the Initial Brief of Appellant and Designation of Matter be held in abeyance pending a ruling on this motion.

Respectfully submitted,



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Jessica M. Saxon  
Appellate Defender



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Robert M. Dudek  
Chief Appellate Defender

This 19th day of December, 2022.

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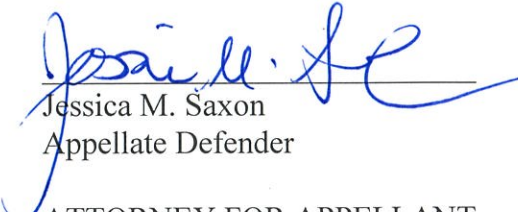
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CERTIFICATE OF SERVICE

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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 19th day of December, 2022.

  
Jessica M. Saxon  
Appellate Defender  
ATTORNEY FOR APPELLANT

**From:** [Warren, Kaylynn](#)  
**To:** [William Blich](#)  
**Cc:** [Saxon, Jessica](#); [Caroline Collins](#)  
**Subject:** 2021-001316 The State v. Terry Shaimek Tyler  
**Date:** Monday, December 19, 2022 11:02:00 AM  
**Attachments:** [2021-001316 The State v. Terry Shaimek Tyler Third Motion for Extension and COS.pdf](#)

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Good Morning,

Please find attached for service in the above-referenced case the Third Motion for an Extension of Time and Certificate of Service which will be filed today, December 19, 2022, with the Court of Appeals via OneDrive.

Respectfully,  
Kaylynn

**Kaylynn Warren**

Administrative Assistant  
South Carolina Commission on Indigent Defense  
Division of Appellate Defense  
(803) 734-1330