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Nov 15 2023

S.C. SUPREME COURT

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Florence County  
Honorable George M. McFaddin, Circuit Court Judge

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LAROSS ANTONIO GRAHAM,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2023-001117

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MOTION FOR AN EXTENSION OF TIME  
IN WHICH TO FILE THE PETITION FOR WRIT OF CERTIORARI AND  
ACCOMPANYING APPENDIX

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Counsel for Laross Antonio Graham respectfully requests an extension of thirty (30) days in which to file the petition for writ of certiorari and accompanying 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 second request for an extension. In support of this request, counsel shows:

1. The petition for writ of certiorari and accompanying appendix are due to be served and filed with the Court today.

2. Counsel for Laross Antonio Graham 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. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Steven Lewis v. The State with the Supreme Court on November 2, 2023. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Carl Stone v. The State with the Supreme Court on October 26, 2023. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Allen Charron Williams v. The State with the Supreme Court on October 19, 2023. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Daniel Lewis Crowe v. The State with the Supreme Court on October 5, 2023. Counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of The State v. Kayla M. Cook with the Supreme Court on September 27, 2023. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Vernon Cooley v. The State with the Supreme Court on September 27, 2023. Counsel filed the brief of appellant pursuant to White v. State in the case of Vernon Cooley v. The State with the Supreme Court on September 27, 2023. Counsel filed the brief of petitioner in the case of Jason Larson v. The State with the Court of Appeals on September 20, 2023. Counsel filed the brief of petitioner in the case of Dennis Cumbee, Jr. v. The State with the Court of Appeals on September 14, 2023. Counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of The State v. Terrell Denard Knightner with the Supreme Court on September 12, 2023.

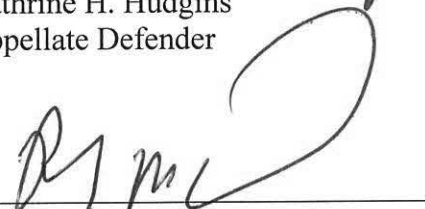
4. Counsel makes this request in good faith and not for purpose of delay.

5. Opposing counsel, the Attorney General's Office, has graciously consented to this extension request by way of the thirty-day general consent granted by email from Deputy Attorney General Donald J. Zelenka dated October 31, 2023 for all Appellate Defense extensions through November 30, 2023.

WHEREFORE, the undersigned counsel would respectfully request a thirty day extension, in which to file the petition for writ of certiorari and accompanying appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,

  
Kathrine H. Hudgins  
Appellate Defender

  
Robert M. Dudek  
Chief Appellate Defender

This 15<sup>th</sup> day of November, 2023.