

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

---

Certiorari to Richland County

Honorable Daniel McLeod Coble, Circuit Court Judge

---

KEYLAN J. DURHAM,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2023-001507

---

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

---

Counsel for Keylan J. Durham respectfully requests a **final thirty (30) day extension, from January 26, 2024 until February 26, 2024**, in which to serve and 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.
2. Counsel for Keylan J. Durham respectfully submits that extraordinary

RECEIVED

Jan 26 2024

S.C. SUPREME COURT

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.

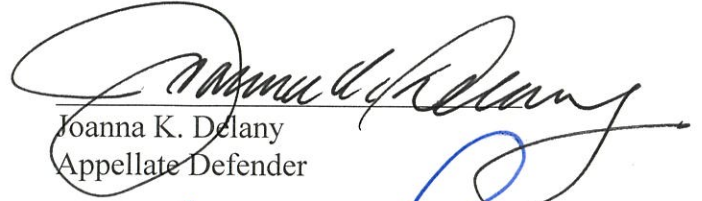
3. Counsel filed the Petition for Writ of Certiorari Pursuant to *Austin v. State* and the Appendix in the case of Breon Alexandre v. The State with this Court on January 18, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Quinterris Carmichael with the Court of Appeals on January 9, 2024. Counsel filed the Initial Brief of Appellant in the case of The State v. Marcus Wigfall with the Court of Appeals on January 5, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Quintin Maurice Collins with the Court of Appeals on December 6, 2023. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Manly M. Thompson with the Court of Appeals on December 1, 2023.

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

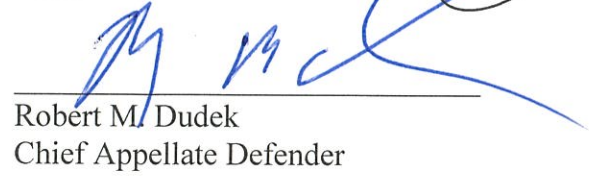
5. On January 2, 2024, opposing counsel, the Office of the Attorney General, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through January 31, 2024.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension from January 26, 2024 until February 26, 2024**, in which to serve and 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,



Joanna K. Delany  
Appellate Defender



Robert M. Dudek  
Chief Appellate Defender

This 26th day of January, 2024.