

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Florence County

Honorable Debra R. McCaslin, Circuit Court Judge

TIMOTHY C. TURBEVILLE,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2023-001664

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

Counsel for Timothy C. Turbeville respectfully requests an extension of thirty (30) days from February 1, 2024 until March 4, 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 second 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 Timothy C. Turbeville respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the

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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 Initial Brief of Appellant and Designation of Matter in the case of The State v. Christopher A. Comer with the Court of Appeals on February 1, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. TyChristian Ladson with the Court of Appeals on January 31, 2024. Counsel filed the Johnson Petition for Writ of Certiorari in the case of David James Lamont Brice v. State with the Supreme Court on January 25, 2024. Counsel filed the Petition for Writ of Certiorari to the Court of Appeals in the case of The State v. Michael T. Means with the Supreme Court on January 12, 2024. Counsel filed the Petition for Writ of Certiorari to the Court of Appeals in the case of The State v. Levy L. Brown with the Supreme Court on January 11, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Corey T. Busch with the Court of Appeals on January 8, 2024. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Anthony Briggs v. State with the Supreme Court on December 18, 2023. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Keith Vincent Brown with the Court of Appeals on December 13, 2023.

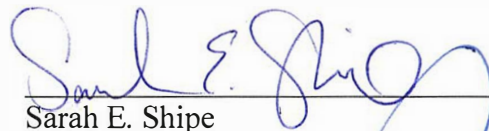
4. Counsel makes this request in good faith and not for purpose of delay.

5. On January 31, 2024, 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 February 29, 2024.

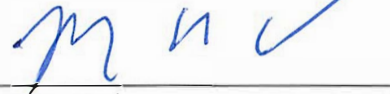
WHEREFORE, the undersigned counsel would respectfully request a thirty (30) day extension from February 1, 2024 until March 4, 2024, in which to serve and file the Petition for

Writ of Certiorari and Appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for serving and filing the Petition for Writ of Certiorari and Appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Sarah E. Shipe
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 1st day of February, 2024.