

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Lexington County
Kristi F. Curtis, Circuit Court Judge

RECEIVED

Feb 28 2024

S.C. SUPREME COURT

HEATHER MARIE LAWSON,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2023-001806

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

Counsel for Petitioner respectfully requests an extension of thirty (30) days 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 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 his caseload, counsel hopes that no further extension requests will be required.

3. Counsel represented petitioner in a PCR reconstruction hearing in the case of Jacoby Fields v. State via WebEx hearing on February 26, 2024. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Nathaniel Hambleton v. State with the Supreme Court on February 22, 2024. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Frederick Jones v. State with the Supreme Court on February 12, 2024. Counsel represented petitioner in a PCR reconstruction hearing in the case of Jacoby Fields v. State via WebEx hearing on February 6, 2024. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Antone B. Ellis Tremayne Blakely with the Court of Appeals on February 5, 2024. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of David Welch v. State with the Supreme Court on January 26, 2024. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Devante Lamont White with the Court of Appeals on January 16, 2024. Counsel filed the Anders brief of appellant and record on appeal in the case of State v. Christopher Shumpert with the Court of Appeals on January 16, 2024. Counsel filed the Anders brief of appellant and record on appeal in the case of State v. Tronahz J.S. Whittington with the Court of Appeals on December 15, 2023. Counsel filed the initial brief of appellant in the case of State v. Jeremy Savoy Cornish with the Court of Appeals on November 28, 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-day extension, 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,

A handwritten signature in blue ink, appearing to read "Breen R. Stevens", written over a horizontal line.

Breen R. Stevens
Appellate Defender

A handwritten signature in blue ink, appearing to read "Robert M. Dudek", written over a horizontal line.

Robert M. Dudek
Chief Appellate Defender

This 28th day of February, 2024.