

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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S.C. SUPREME COURT

Certiorari to Charleston County

Honorable Michael G. Nettles, Circuit Court Judge

DOUGLAS L. YOUNG,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2023-001622

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

Counsel for Douglas L. Young respectfully requests a **final thirty (30) day extension, from March 4, 2024, until April 3, 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 Douglas L. Young 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.

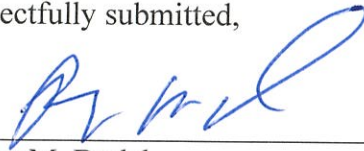
3. Counsel was a presenter at the S.C. Bar Criminal Practice CLE on February 23, 2024, in Columbia, South Carolina. Counsel is filing the Initial Brief of Appellant and Designation of Matter in the case of The State v. John A. Welch with the Court of Appeals on March 6, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Anthony Argoe with the Court of Appeals on February 7, 2024. Counsel, along with co-counsels David Alexander and Lara M. Caudy, filed the Reply to the Brief in Opposition in the case of The State of South Carolina v. Timothy Ray Jones with the United States Supreme Court on February 2, 2024. Counsel filed the Initial Brief of Appellant in the case of The State v. Tirik Johnson-Epps with the Court of Appeals on January 9, 2024. Counsel filed the Brief of Appellant in the case of The State v. Martel Gaddis with the Court of Appeals on December 12, 2023. **Counsel also has extensive administrative duties as the Chief Appellate Defender.**

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

5. On February 28, 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 March 31, 2024.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension from March 4, 2024, until April 3, 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,



Robert M. Dudek
Chief Appellate Defender



J. Hugh Ryan, III
Executive Director/
Hervey B. O. Young
Deputy Director and General Counsel/
W. Lawrence Brown
Deputy General Counsel and Training Director

This 4th day of March, 2024.