

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Berkeley County

Honorable Diane Schafer Goodstein, Circuit Court Judge  
\_\_\_\_\_

FRED FREEMAN,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2023-001221  
\_\_\_\_\_

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

Counsel for Fred Freeman 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 Fred Freeman 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,

**RECEIVED**

**Apr 03 2024**

S.C. SUPREME COURT

counsel hopes that no further extension requests will be required.


3. Today, April 3, 2024, counsel filed the initial brief of appellant and designation of matter in The State v. Robert Lee Belcher with the Court of Appeals. On March 27, 2024, counsel filed the petition for writ of certiorari and accompanying appendix in Mark Earls v. The State with the Supreme Court. On March 21, 2024, counsel filed the brief of appellant and designation of matter in The State v. Fernando Wright with the Court of Appeals. On March 18, 2024, counsel filed the initial brief of respondent and designation of matter in The State v. Juan Manuel Ramirez Sandoval with the Court of Appeals. On March 14, 2024, counsel filed the return to the petition for writ of certiorari in Gabriel Rios v. The State with the Supreme Court. On March 8, 2024, counsel filed the petition for writ of certiorari, brief of appellant pursuant to White v. State, and accompanying appendix in Anthony Sanders v. The State with the Supreme Court. On March 1, 2024, counsel filed the initial brief of appellant and designation of matter in The State v. Randy Dean Grainger with the Court of Appeals.

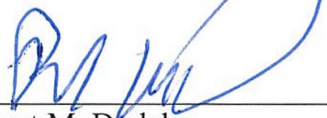
4. Counsel makes this request in good faith and not for purpose of delay.

5. On March 29, 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 April 30, 2024.

WHEREFORE, the undersigned counsel would respectfully request a thirty (30) 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,

  
\_\_\_\_\_  
Lara M. Caudy  
Appellate Defender

  
\_\_\_\_\_  
Robert M. Dudek  
Chief Appellate Defender

This 3rd day of April, 2024.