

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Charleston County

Honorable Clifton Newman, Circuit Court Judge

MONTRE DESEAN BROWN,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2023-001807

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

Counsel for Montre Desean Brown respectfully requests an extension of thirty (30) days from April 10, 2024 until May 10, 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 Montre Desean Brown respectfully submits that extraordinary

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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 and Appendix in the case of Timothy Harrison v. The State with this Court on April 5, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Marvin Donte Bryan with the Court of Appeals on April 1, 2024. Counsel filed the Petition for Rehearing in the case of Brittany C. Foster v. The State with the Court of Appeals on March 28, 2024. Counsel appeared for Oral Argument in the case of The State v. Richard Kenneth Galloway before this Court on March 27, 2024. Counsel appeared for Oral Argument in the case of The State v. Eric Emanuel English before this Court on March 6, 2024. Counsel filed the Return to Motion to Relieve Counsel in the case of Richard Douglas Waldrop v. The State with the Court of Appeals on March 1, 2024. Counsel filed the Motion to Hold in Abeyance in the case of Marvin Donte Bryan v. The State with the Court of Appeals on March 1, 2024.

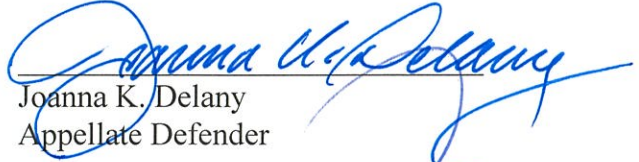
4. Counsel makes this request in good faith and not for purpose of delay.

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 from April 10, 2024 until May 10, 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,


Joanna K. Delany
Appellate Defender


Robert M. Dudek
Chief Appellate Defender

This 10th day of April, 2024.