

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 TO SERVE AND FILE
THE PETITION FOR WRIT OF CERTIORARI
AND APPENDIX

Counsel for Montre Desean Brown respectfully requests a **final thirty (30) day extension, from May 9, 2024 until June 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 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 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.

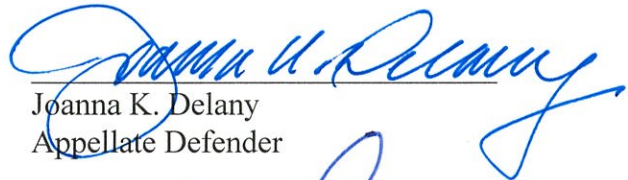
3. Counsel appeared for Oral Argument in the case of The State v. Michael Christian Barclay before the Court of Appeals yesterday, May 8, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Genari McNeil with the Court of Appeals on May 2, 2024. Counsel filed the Initial Reply Brief of Appellant in the case of The State v. Manly Maurice Thompson with the Court of Appeals on April 24, 2024. Counsel filed the Johnson Petition for Writ of Certiorari and Appendix in the case of Newitt R. Walker v. The State with this Court on April 22, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Braylon L. Morris with the Court of Appeals on April 22, 2024. Counsel appeared for Oral Argument in the case of In the Matter of Thomas Griffin before the Supreme Court on April 16, 2024. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Timothy Harrison v. The State with the Supreme 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 the Supreme Court on March 27, 2024. Counsel appeared for Oral Argument in the case of The State v. Eric Emanuel English before the Supreme Court on March 6, 2024.


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

5. On May 1, 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 May 31, 2024.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension from May 9, 2024 until June 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 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 9th day of May, 2024.