

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Certiorari to Newberry County

Honorable J. Mark Hayes, Circuit Court Judge

CARROL TREMAYNE WASHINGTON,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2021-000754

MOTION FOR AN EXTENSION OF TIME
TO FILE THE BRIEF OF PETITIONER

Counsel for Carrol T. Washington respectfully requests an extension of thirty (30) days in which to serve and file the brief of petitioner 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 brief of petitioner is due to be served and filed with the Court today.
2. Counsel for Carrol T. Washington 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, counsel hopes that no further extension requests will be required.

3. On June 3, 2024, counsel filed the petition for writ of certiorari and accompanying appendix in Fred Freeman v. The State with the Supreme Court. On May 29, 2024, counsel filed the initial brief of appellant and designation of matter in The State v. Trevor Irvin with the Court of Appeals. On May 22, 2024, counsel filed the initial brief of appellant and designation of matter in The State v. Michael Youman with the Court of Appeals. On May 7, 2024, counsel had an oral argument in The State v. Nathaniel Rowland before the Court of Appeals. On April 30, 2024, counsel filed the initial brief of appellant and designation of matter in The State v. James Earl Smith with the Court of Appeals. On April 25, 2024, counsel filed the initial brief of appellant and designation of matter in The State v. Mavric Smith with the Court of Appeals. On April 12, 2024, counsel filed the return to the petition for rehearing in The State v. Mark Hailey with the Court of Appeals. On April 5, 2024, counsel filed the return to the petition for writ of certiorari to the Court of Appeals in The State v. Donnielle Matthews with the Supreme Court. On 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.


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

5. On May 30, 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 June 30, 2024.

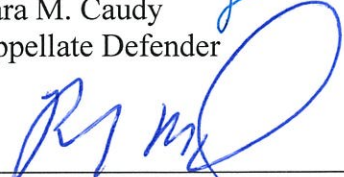
WHEREFORE, the undersigned counsel would respectfully request a thirty (30) day extension in which to serve and file the brief of petitioner in this case based upon the above

exigent circumstances. Counsel requests that time limits for serving and filing the brief of petitioner be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Lara M. Caudy
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 5th day of June, 2024.

RECEIVED

Jun 05 2024

SC Court of Appeals

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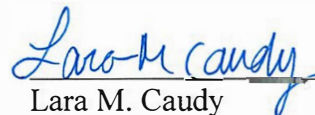
STATE OF SOUTH CAROLINA,

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APPELLATE CASE NO. 2021-000754

CERTIFICATE OF SERVICE

Pursuant to Rule 262(a)(3) and Rule 262(c)(3), SCACR, the undersigned hereby certifies a true copy of the Motion for Extension in the above-referenced case has been served upon Zachary W. Jones, Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), this 5th day of June, 2024.



Lara M. Caudy
Appellate Defender

ATTORNEY FOR PETITIONER

From: [Mcinnis, Sara](#)
To: [Zachary Jones](#)
Cc: [Zilcia Williams](#); [Caudy, Lara](#)
Subject: 2021-000754 Carrol Washington v. State Brief of Petitioner Extension 2
Date: Wednesday, June 5, 2024 10:22:00 AM
Attachments: [2021-000754 Carrol Washington v. State BOP Extension 2.pdf](#)

Good Morning Mr. Jones,

Please find attached for service in the above-referenced case the second motion for an extension of time to serve and file the brief of petitioner. This motion will be filed with the Court of Appeals today, June 5, 2024, via email filing.

Thank you!

Sara McInnis

Administrative Assistant
South Carolina Commission on Indigent Defense
Appellate Division
(803) 734-1330