

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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Certiorari to Sumter County

Honorable Edgar W. Dickson, Circuit Court Judge

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TYRONE JOSEY,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2024-000218

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

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Counsel for Tyrone Josey 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 Tyrone Josey respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of

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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 19, 2024, counsel had an oral argument in The State v. Nyquan Brown before the Supreme Court. On June 11, 2024, counsel filed the brief of petitioner in Carrol Washington v. The State with the Court of Appeals. On June 7, 2024, counsel filed the petition for writ of certiorari and accompanying appendix in Orlando Coleman v. The State with the Supreme Court. 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.

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

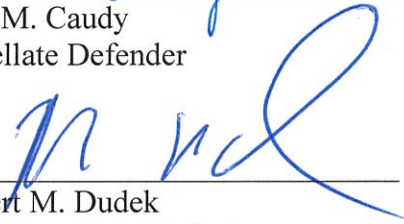
5. On June 26, 2024, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through July 31, 2024.

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 1st day of July, 2024.