

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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S.C. SUPREME COURT

Certiorari to Marion County

Honorable Debra R. McCaslin, Circuit Court Judge

KENDELL A. GAMBLE,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2024-000264

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

Counsel for Kendell A. Gamble, respectfully requests a **final thirty (30) day extension, from July 3, 2024, until August 2, 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 Kendell A. Gamble 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.

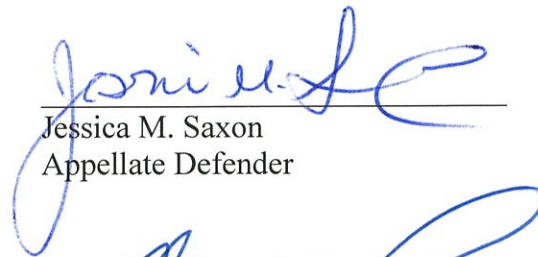
3. Counsel filed the Reply Brief of Appellant in the case of The State v. Lillian Mae Bates with the Court of Appeals on June 24, 2024. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Larenzoe Epps v. The State with the Supreme Court on June 20, 2024. Counsel filed the Johnson Petition for Writ of Certiorari and Appendix in the case of Sterling Maybin v. The State with the Supreme Court on June 6, 2024. Counsel had an oral argument in the case of Justin Cone v. The State before the Supreme Court on May 23, 2024. Counsel filed the Johnson Petition for Writ of Certiorari and Appendix in the case of Derrick Dupree v. The State with the Supreme Court on May 22, 2024. Counsel filed the Return to Petition for Rehearing in the case of Devatee Tymar Clinton v. The State with the Court of Appeals on May 16, 2024. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Robert C. Cribb v. The State with the Supreme Court on May 15, 2024. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Gerald Ancrum v. The State with the Supreme Court on May 6, 2024. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Rishawn Lamar Reeder v. The State with the Supreme Court on April 22, 2024. Counsel filed the Anders Brief of Appellant, Designation of Matter and Record on Appeal in the case of The State v. Latoya Rivers with the Court of Appeals on April 17, 2024.

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

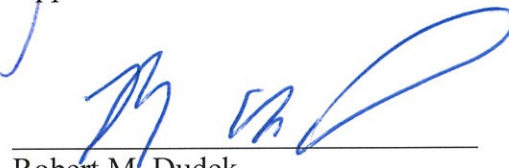
5. On June 28, 2024, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through July 31, 2024.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, from July 3, 2024, until August 2, 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,



Jessica M. Saxon
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 3rd day of July, 2024.