

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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Jul 10 2024

S.C. SUPREME COURT

Certiorari to Lexington County

Honorable George M. McFaddin, Circuit Court Judge

EDDIE L. BASS, III,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2024-000535

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

Counsel for Eddie Louis Bass respectfully requests an extension of thirty (30) days from July 10, 2024, until August 9, 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 Eddie Louis Bass 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 his caseload, counsel hopes that no further extension requests will be required.

3. Counsel was a faculty trainer specializing in preserving trial issues for appeal at the PD 103 CLE seminar at the Greenville County Courthouse this week from July 1-3, 2024. Counsel filed the three issue Petition for Writ of Certiorari and Appendix in the case of Christopher Moore v. The State with this Court on Friday, June 28, 2024. Counsel presented on the Case Law Update at the Indigent Defense CLE on June 21, 2024, in Columbia. Counsel filed the Petition for Writ of Certiorari to the Court of Appeals in the case of Shana Robinson v. The State with this Court on June 10, 2024. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Cory Allen v. The State with this Court on June 6, 2024. Counsel filed the Brief of Appellant in the case of The State v. Cornelius J. Staggers with the Court of Appeals on May 24, 2024. Counsel filed the Brief of Appellant in the case of The State v. Freddy Ray Harris with the Court of Appeals on May 9, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Mason Yarborough with the Court of Appeals on May 1, 2024. **Counsel also has extensive administrative duties as the Chief Appellate Defender.**

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

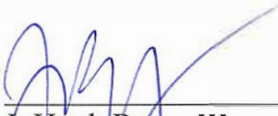
5. On June 26, 2024, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through July 31, 2024.

WHEREFORE, the undersigned counsel would respectfully request a thirty (30) day extension from July 10, 2024, until August 7, 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,



Robert M. Dudek
Chief Appellate Defender



J. Hugh Ryan, III
Executive Director/
Hervey B. O. Young
Deputy Director and General Counsel/
W. Lawrence Brown
Deputy General Counsel and Training Director

This 10th day of July, 2024.