

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Lexington County

George M. McFaddin, Circuit Court Judge

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**RECEIVED**

**Aug 12 2024**

S.C. SUPREME COURT

BILLY GEISENDORFF,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2024-000232

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

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Counsel for Petitioner 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 Petitioner 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.

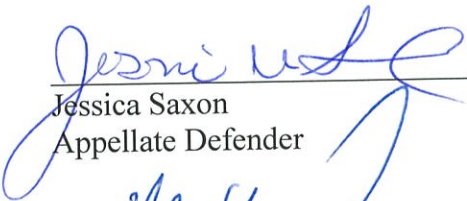
3. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Joyce Stover with the Court of Appeals on August 7, 2024. Counsel filed the Johnson Petition for Writ of Certiorari and Appendix in the case of Samuel Campbell v. The State with the Supreme Court on July 18, 2024. Counsel filed the Johnson Petition for Writ of Certiorari and Appendix in the case of Kendell A. Gamble v. The State with the Supreme Court on July 18, 2024. Counsel filed the Anders Brief of Appellant and Record on Appeal in the case of The State v. Rekeem L. Ware with the Court of Appeals on July 12, 2024. Counsel filed the Reply Brief of Appellant in the case of The State v. Celia Windham with the Court of Appeals on July 1, 2024. 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.

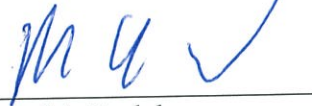
4. Counsel makes this request in good faith and not for purpose of delay.

5. On July 29, 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 August 31, 2024.

WHEREFORE, the undersigned counsel would respectfully request a thirty-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,

  
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Jessica Saxon  
Appellate Defender

  
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Robert M. Dudek  
Chief Appellate Defender

This 12th day of August, 2024.