

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Lexington County

George M. McFaddin, Circuit Court Judge

RECEIVED

Sep 11 2024

S.C. SUPREME COURT

BILLY GEISENDORFF,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2024-000232

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

Counsel for petitioner respectfully requests a **final thirty (30) day extension, until October 11, 2024**, in which to 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. The Court has granted counsel two previous extensions.
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.

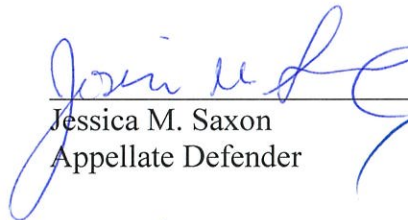
3. Counsel filed the Petition for Writ of Certiorari to the Court of Appeals in the case of Devartee Clinton v. The State with the Supreme Court on September 3, 2024. Counsel filed the Johnson Petition for Writ of Certiorari and Appendix in the case of Tony Williams v. The State with the Supreme Court on September 3, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. James Major with the Court of Appeals on August 28, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Kyle Mouzon with the Court of Appeals on August 21, 2024. Counsel filed the Anders brief of appellant pursuant to White v. State in the case of The State v. Edward Kik with the Supreme Court on August 12, 2024. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Edward Kirk v. The State with the Supreme Court on August 12, 2024. Counsel filed the Johnson Petition for Writ of Certiorari and Appendix in the case of Demond Derrick Burgess v. The State with the Supreme Court on August 12, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Joyce Stover with the Court of Appeals on August 12, 2023. Counsel filed the Reply Brief of Appellant in the case of The State v. Johnny Haggins with the Court of Appeals on August 9, 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 19, 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 19, 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.

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


5. On August 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 September 30, 2024.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until September 30, 2024**, in which to file the Petition for Writ of Certiorari and Appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for 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 11th day of September, 2024.