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Sep 18 2024

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

S.C. SUPREME COURT

Certiorari to York County

Walton J. McLeod, IV, Circuit Court Judge

CARLY BLUMENSTEIN,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2024-000932

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

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 Anders brief of appellant and record on appeal in the case of State v. Alex D. Anderson with the Court of Appeals on September 16, 2024. Counsel filed the Anders brief of appellant and record on appeal in the case of State v. Brian Nesbitt with the Court of Appeals on September 16, 2024. Counsel filed the Anders brief of appellant and record on appeal in the case of State v. Zora Simone Henderson with the Court of Appeals on September 4, 2024. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Jesse Dewitt Osborne with the Court of Appeals on August 28, 2024. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Melvin Durant v. State with the Supreme Court on August 14, 2024. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of James Edgar Hutchinson v. State with the Supreme Court on August 7, 2024. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Dean N. Seagers v. State with the Supreme Court on August 2, 2024. Counsel filed the Anders brief of appellant and record on appeal in the case of State v. Victoria A. Gregorio with the Court of Appeals on July 24, 2024. Counsel filed the Anders brief of appellant and record on appeal in the case of State v. Russell L. Walker with the Court of Appeals on July 18, 2024. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Justin R. Medford with the Court of Appeals on July 15, 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

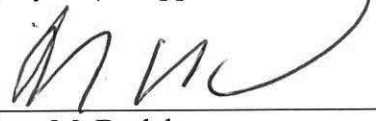
Attorney General Donald J. Zelenka for all Appellate Defense extensions through September 30, 2024.

WHEREFORE, the undersigned counsel would respectfully request a 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,



Wanda H. Carter
Deputy Chief Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 18th day of September, 2024.