

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Lexington County

Honorable Jocelyn J. Newman, Circuit Court Judge

KEVIN LAWRENCE PEARSON,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2024-000233

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

Counsel for Kevin Lawrence Pearson respectfully requests an extension of thirty (30) days from October 10, 2024 until November 12, 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 Kevin Lawrence Pearson respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the

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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 Designation of Matter in the case of The State v. Raekwon Ellerbe with the Court of Appeals on October 9, 2024. Counsel filed the Initial Brief of Appellant/Respondent and Designation of Matter in the case of The State v. Terrence O. Frazier with the Court of Appeals on October 1, 2024. Counsel filed the Petition for Writ of Certiorari and the Appendix in the case of Marqual Devine Griffin v. The State with this Court on September 24, 2024. Counsel filed the Initial Reply Brief of Appellant in the case of The State v. Quinterris J. Carmichael with the Court of Appeals on September 5, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Ty Leic Dae Jhon Chaneyfield with the Court of Appeals on August 20, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Frank L. Mills with the Court of Appeals on August 5, 2024. Counsel filed the *Johnson* Petition for Writ of Certiorari and the Appendix in the case of Jaycoby Terreak Williams v. The State with this Court on August 5, 2024.

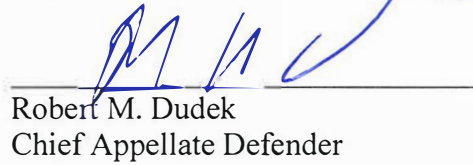
4. Counsel makes this request in good faith and not for purpose of delay.

5. On September 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 October 31, 2024.

WHEREFORE, the undersigned counsel would respectfully request a thirty (30) day extension from October 10, 2024 until November 12, 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,


Joanna K. Delany
Appellate Defender


Robert M. Dudek
Chief Appellate Defender

This 10th day of October, 2024.