

RECEIVED

Oct 23 2024

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Sumter County

R. Kirk Griffin, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

TOWODI TECUMSEH SHEQUOYAH,

APPELLANT

APPELLATE CASE NO. 2023-001846

MOTION FOR AN EXTENSION OF TIME TO
SERVE AND FILE THE INITIAL BRIEF OF APPELLANT
AND DESIGNATION OF MATTER

Counsel for Towodi Tecumseh Shequoyah respectfully requests a **fifth and final twenty-four (24) day extension from October 23, 2024, until November 15, 2024**, in which to serve and file the Initial Brief of Appellant and Designation of Matter in the above-referenced case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009.

This is a fifth request for an extension. In support of this request, counsel shows:

1. The Initial Brief of Appellant and Designation of Matter in this case are due to be served and filed with the Court today.
2. Counsel for Towodi Tecumseh Shequoyah respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. **Counsel must**

attend in person the PCR hearing for Tyshun Bessilieu to be held in Georgetown on October 28, 2024. Counsel is also currently preparing for oral argument in State v. Rashawn Vertez Carter scheduled before the Supreme Court on October 30, 2024.

3. Counsel makes this request in good faith and not for purpose of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

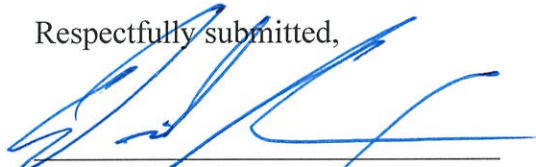
4. Counsel filed the Brief of Appellant and Supplemental Record on Appeal in the case of The State v. Arkevus Jimon Cauthen with the Court of Appeals on October 21, 2024. From October 14-16, 2024 Counsel attended the annual Public Defender's Conference in Myrtle Beach. Counsel filed the Petition for Writ of Certiorari in the case of De' Andre Murphy v. The State with the Supreme Court on October 15, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. William McKinney with the Court of Appeals on October 10, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Desmond Lamar Green with the Court of Appeals on October 10, 2024. Counsel filed the Petition for Writ of Certiorari to the Court of Appeals in the case of In the Matter of the Care and Treatment of James Gregory Younger with the Supreme Court on October 9, 2024. Counsel filed the Brief of Appellant and Designation of Matter in the case of The State v. Stacy Michelle Rabon with the Court of Appeals on September 30, 2024. Counsel filed the Anders Brief of Appellant in the case of In the Matter of the Care and Treatment of Walter Vaughn with the Court of Appeals on September 11, 2024. Counsel filed the Anders Brief of Appellant in the case of The State v. William Rivers with the Court of Appeals on September 11, 2024. Counsel filed the Brief of Appellant and Designation of Matter in the case of The State v. Dameun Sanders with

the Court of Appeals on August 27, 2024.

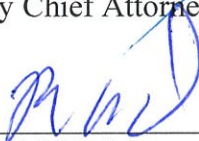
5. On September 30, 2024, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through October 31, 2024.

WHEREFORE, the undersigned counsel would respectfully request a **fifth and final twenty-four (24) day extension from October 23, 2024, until November 15, 2024**, in which to serve and file the Initial Brief of Appellant and Designation of Matter in this case based upon the above exigent circumstances.

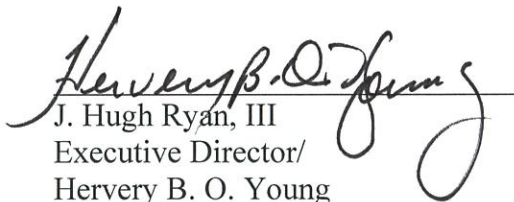
Respectfully submitted,



David Alexander
Deputy Chief Attorney for Capital Appeals



Robert M. Dudek
Chief Appellate Defender



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

This 23rd day of October, 2024.

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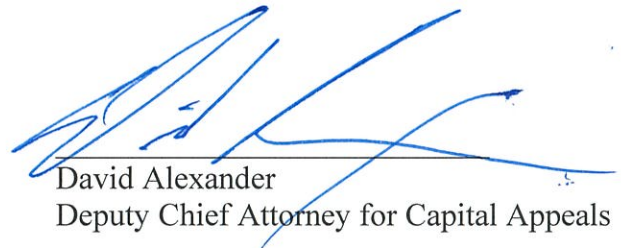
TOWODI TECUMSEH SHEQUOYAH,

APPELLANT

APPELLATE CASE NO. 2023-001846

CERTIFICATE OF SERVICE

Pursuant to Rule 262(a)(3) and Rule 262(c)(3), SCACR, the undersigned hereby certifies a true copy of the Motion for Extension in the above-referenced case has been served upon Mark R. Farthing, Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), this 23rd day of October, 2024.



David Alexander
Deputy Chief Attorney for Capital Appeals

ATTORNEY FOR APPELLANT

From: [Stock, Chris](#)
To: mfarthing@scag.gov; [SC - COLLINS CAROLINE](#)
Cc: [Alexander, David](#)
Subject: 2023-001846 The State v. Towodi T. Shequoyah - Fifth Motion for Extension
Date: Wednesday, October 23, 2024 11:38:00 AM
Attachments: [2023-001846 The State v. Towodi T. Shequoyah - Fifth Motion for Extension.pdf](#)

Mr. Farthing,

Please find attached for service the 5th Request for Extension for Initial Brief of Appellant and Designation of Matter for Towodi T. Shequoyah's appeal which will be filed today with the Court of Appeals.

Thank you.

Chris

Chris Stock
Administrative Assistant
Commission on Indigent Defense
Appellate Division
(803) 734-1330