

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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Certiorari to Charleston County

Walton J. McLeod, IV, Circuit Court Judge  
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DANIEL J. REED,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2024-000896  
\_\_\_\_\_

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 December 23, 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

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previously granted and the order in which counsel attempts to manage her caseload, counsel hopes that no further extension requests will be required.

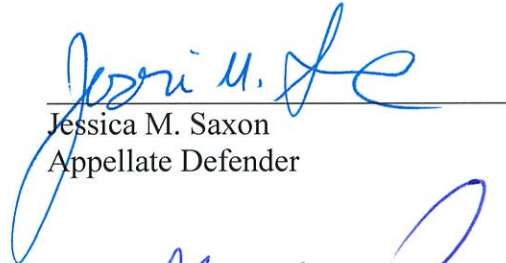
3. Counsel filed the Petition for Rehearing in the case of State v. Darrell D. Wilson with the Court of Appeals on November 21, 2024. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Philip Miller with the Court of Appeals on November 20, 2024. Counsel filed the Johnson Petition for Writ of Certiorari and Appendix in the case of Ronald Michaux v. The State with the Supreme Court on November 18, 2024. Counsel filed the Johnson Petition for Writ of Certiorari and Appendix in the case of Clyde Singletary v. The State with the Supreme Court on November 12, 2024. Counsel filed the Anders Brief of Appellant and Record on Appeal in the case of The State v. Akeem Hampton with the Court of Appeals on November 6, 2024. Counsel filed the Anders Brief of Appellant and Record on Appeal in the case of The State v. Akeem Hickman with the Court of Appeals on October 31, 2024. Counsel attended the annual South Carolina Public Defender Conference in Myrtle Beach, South Carolina from October 14-16, 2024. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Billy Geisendorff v. The State with the Supreme Court on October 11, 2024. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Paul Lamberth with the Court of Appeals on October 10, 2024. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Willie Morrison v. The State with the Court of Appeals on October 7, 2024. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. James Gregory with the Court of Appeals on October 7, 2024.

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

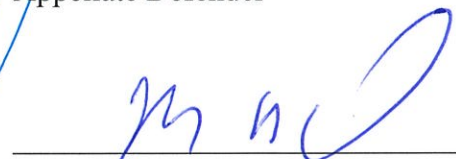
5. On October 31, 2024, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through November 30, 2024.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until December 23, 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 22nd day of December, 2024.