

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Jasper County

Honorable Kristi F. Curtis, Circuit Court Judge

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NAIJUWUAN S. CHISOLM,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2024-000965

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

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Counsel for Naijuwuan S. Chisolm respectfully requests an extension of thirty (30) days from November 25, 2024 until December 27, 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 Naijuwuan S. Chisolm respectfully submits that extraordinary

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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 and the Appendix in the case of Dante Zachius Wheeler v. The State with this Court on November 20, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Steve Lester with the Court of Appeals on November 20, 2024. Counsel filed the Reply to Return to Petition for Writ of Certiorari in the case of Ben Robert Stewart v. The State with this Court on November 14, 2024. Counsel filed the Petition for Rehearing in the case of Brian Foster v. The State with the Court of Appeals on November 14, 2024. Counsel filed the Return to Petition for Writ of Certiorari to the Court of Appeals in the case of In the Matter of the Care and Treatment of James L. Williford with this Court on November 5, 2024. Counsel filed the Brief of Appellant and the Record on Appeal in the case of The State v. Felicia Danielle Turnage with the Court of Appeals on November 1, 2024. Counsel filed the Brief of Appellant and the Record on Appeal in the case of The State v. Vincent Dwight with the Court of Appeals on October 30, 2024. Counsel filed the Petition for Writ of Certiorari and the Appendix in the case of Wayne Hankinson v. The State with this Court on October 28, 2024. Counsel filed the Brief of Appellant and Record on Appeal in the case of The State v. Kweisi Nicks with the Court of Appeals on October 4, 2024. Counsel appeared for Oral Argument in the case of The State v. Bradley Corlew before the Court of Appeals on September 24, 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

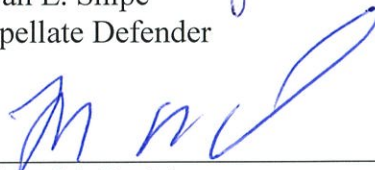
consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through November 30, 2024.

WHEREFORE, the undersigned counsel would respectfully request a thirty (30) day extension from November 25, 2024 until December 27, 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,



Sarah E. Shipe  
Appellate Defender



Robert M. Dudek  
Chief Appellate Defender

This 25th day of November, 2024.