

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

RECEIVED

Nov 25 2024

S.C. SUPREME COURT

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Certiorari to York County

Honorable J. Mark Hayes, Circuit Court Judge  
\_\_\_\_\_

JEFFERSON QUINDE QUISHPI,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2024-000617  
\_\_\_\_\_

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

Counsel for Jefferson Quinde Quishpi respectfully requests an extension of ten (10) days in which to file the petition for writ of certiorari and accompanying 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 Jefferson Quinde Quishpi 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 his caseload, counsel hopes that no further extension requests will be required.

3. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Thomas Eric McDowell with the Court of Appeals on November 25, 2024. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Daniel Jamaal Lawrence v. The State with the Supreme Court on November 13, 2024. Counsel filed the brief of appellant pursuant to White v. State in the case of Daniel Jamaal Lawrence v. The State with the Supreme Court on November 13, 2024. Counsel had an oral argument in the case of The State v. Andre Junior Covington before the Court of Appeals on November 5, 2024. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Norman Philip Browne with the Court of Appeals on October 11, 2024. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Varsheen Antuan Smith v. The State with the Supreme Court on September 23, 2024.

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

5. Opposing counsel, the Attorney General's Office, has graciously consented to this extension request by way of the thirty-day general consent granted by email from Deputy Attorney General Donald J. Zelenka dated October 30, 2024 for all Appellate Defense extensions through November 30, 2024.

WHEREFORE, the undersigned counsel would respectfully request a thirty (30) 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 filing the petition for writ of certiorari and appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



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Jordan Wayburn  
Appellate Defender



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Robert M. Dudek  
Chief Appellate Defender

This 25<sup>th</sup> day of November, 2024.