

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Florence County

Honorable Clifton Newman, Circuit Court Judge

RANDALL LOYIS SIMPSON,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2024-001349

MOTION TO FILE EXTENSION REQUEST OUT OF TIME
AND FOR A THIRTY DAY EXTENSION OF TIME
TO FILE THE PETITION FOR WRIT OF CERTIORARI
AND APPENDIX

Counsel for Randall Loyis Simpson respectfully requests an extension of thirty (30) days 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 were due to be served and filed with the Court on November 27, 2024.
2. Due to an administrative error, the second motion for an extension of time to serve and file the petition for writ of certiorari and appendix was not timely filed with this Court.

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3. Counsel for Randall Loyis Simpson 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 her caseload, counsel hopes that no further extension requests will be required.

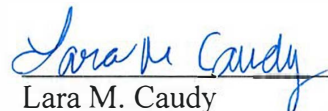
4. On November 19, 2024, counsel filed the return to the petition for writ of certiorari to the Court of Appeals in In the Matter of the Care and Treatment of Andy Eugene Hyman with the Supreme Court. On November 15, 2024, counsel filed the return to the petition for writ of certiorari to the Court of Appeals in In the Matter of the Care and Treatment of Shawn Daily with the Supreme Court. On November 12, 2024, counsel had an oral argument in Carrol Washington v. The State before the Court of Appeals. On November 12, 2024, counsel filed the petition for writ of certiorari, brief of appellant pursuant to White v. State, and accompanying appendix in Angelo Ham v. The State with the Supreme Court. On November 4, 2024, counsel filed the petition for writ of certiorari to the Court of Appeals in The State v. Nathaniel Rowland with the Supreme Court. On November 1, 2024, counsel filed the brief of respondent in The State v. Mark Hailey with the Supreme Court. On October 28, 2024, counsel filed the initial brief of appellant and designation of matter in The State v. Savayea Glenn with the Court of Appeals.

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


6. On November 27, 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 December 31, 2024.

WHEREFORE, based on the above showing, undersigned counsel respectfully requests the Court allow counsel to file a motion for an extension of time to serve and file the Petition for Writ of Certiorari and Appendix in this case out of time, and a thirty (30) day extension to serve and file the Petition for Writ of Certiorari and Appendix 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,



Lara M. Caudy
Senior Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 3rd day of December, 2024.