

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Dec 27 2024

S.C. SUPREME COURT

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 TO SERVE AND FILE  
THE PETITION FOR WRIT OF CERTIORARI  
AND APPENDIX

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Counsel for Naijuwuan S. Chisolm respectfully requests a **final thirty (30) day extension, from December 27, 2024 until January 27, 2025**, 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 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.
2. Counsel for Naijuwuan S. Chisolm 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.

3. Counsel filed the Petition for Rehearing in the case of The State v. Bradley Mark Corlew with the Court of Appeals on December 19, 2024. Counsel appeared before Judge Daniel McLeod Coble in the Richland County Court of General Sessions for a remote Reconstruction Hearing in the case of Alonzo Tarell Jones v. The State on December 17, 2024. Counsel filed the Petition for Writ of Certiorari and the Appendix in the case of Jontez M. Ward v. The State with this Court on December 11, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Michael J. Smith with the Court of Appeals on December 9, 2024. Counsel filed the Petition for Writ of Certiorari, the Brief of Petitioner Pursuant to *White v. State*, and the Appendix in the case of Matthew L. Jackson v. The State with this Court on December 3, 2024. 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.

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

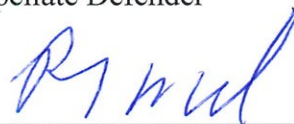
5. On November 27, 2024, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through December 31, 2024.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension from December 27, 2024 until January 27, 2025**, 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,



Sarah E. Shipe  
Appellate Defender



Robert M. Dudek  
Chief Appellate Defender

This 27th day of December, 2024.