

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Calhoun County

Paul M. Burch, Circuit Court Judge

RECEIVED

Jan 06 2025

S.C. SUPREME COURT

BRYANT MCKNIGHT,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2024-000752

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

Counsel for Petitioner 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 are due to be served and filed with the Court today.
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

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 initial brief of appellant and designation of matter in the case of State v. Akim Jean-Charles with the Court of Appeals on January 3, 2025. Counsel filed the brief of petitioner in the case of Maurice Odom v. State with the Court of Appeals on January 3, 2025. Counsel filed the brief of petitioner in the case of Derrick M. Miller v. State with the Court of Appeals on January 3, 2025. Counsel filed the Johnson Petition for Writ of Certiorari and Appendix in the case of Jaren Meyers v. The State with the Supreme Court on December 23, 2024. Counsel filed the Johnson Petition for Writ of Certiorari and Appendix in the case of Daniel J. Reed v. The State with the Supreme Court on December 20, 2024. Counsel filed the Brief of Respondent in the case of Mitchell Rivers v. State with the Supreme Court on December 16, 2024. Counsel had an oral argument in the case of Holly Jo Thompson v. State in the Court of Appeals on December 3, 2024. Counsel filed the Johnson Petition for Writ of Certiorari and Appendix in the case of Vincent Missouri v. The State with the Supreme Court on November 25, 2024. 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

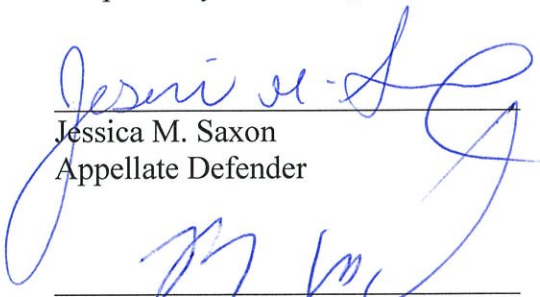
and Record on Appeal in the case of The State v. Akeem Hickman with the Court of Appeals on October 31, 2024.

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

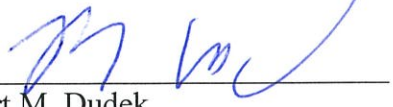
5. On December 31, 2024, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through January 31, 2025.

WHEREFORE, the undersigned counsel would respectfully request a thirty-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 serving and 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 6th day of January, 2025.