

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

RECEIVED

Jan 27 2025

S.C. SUPREME COURT

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Certiorari to Berkeley County

Honorable Walton J. McLeod, IV, Circuit Court Judge  
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NATALIA CHISOLM,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2024-000793  
\_\_\_\_\_

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

Counsel for Natalia Chisolm respectfully requests a **final thirty (30) day extension, from January 27, 2025 until February 26, 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 Natalia 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.

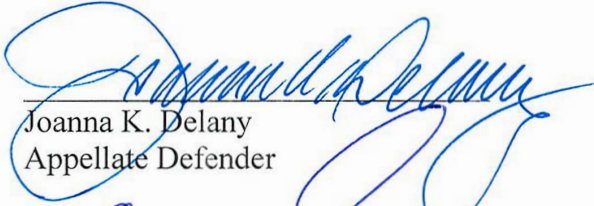
3. Counsel filed the Petition for Rehearing in the case of The State v. Terry Gridine with the Court of Appeals on January 23, 2025. Counsel filed the Initial Reply Brief of Appellant in the case of The State v. Travontae Mitchell with the Court of Appeals on January 13, 2025. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Darius G. Dickey with the Court of Appeals on January 3, 2025. Counsel filed the *Johnson* Petition for Writ of Certiorari in the case of Courtney E. Brock v. State with the Supreme Court on December 3, 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 **final thirty (30) day extension from January 27, 2025 until February 26, 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,



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Joanna K. Delany  
Appellate Defender



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Robert M. Dudek  
Chief Appellate Defender

This 27th day of January, 2025.