

IN THE STATE OF SOUTH CAROLINA
In the Supreme Court

RECEIVED

Feb 06 2025

APPEAL FROM ALLENDALE COUNTY
Court of Common Pleas

S.C. SUPREME COURT

The Honorable Robert J. Bonds, Circuit Court Judge

Case No. 2024- 001082

LaParis Flowers,

Petitioner,

vs.

State of South Carolina,

Respondent.

**MOTION FOR EXTENSION TO FILE REPLY TO RETURN TO PETITION FOR
WRIT OF CERTIORARI**

Undersigned counsel respectfully requests a two-week extension to file the reply brief in the above-captioned matter. It is currently due February 6, 2025. Counsel respectfully requests a due date of **February 20**, 2024. Counsel recently, on January 30 had an oral argument in Cincinnati at the Sixth Circuit Court of Appeals which required out of state travel. *United States v. Yogesh Pancholi*, Case 24-1127, and she had two reply briefs that were filed on February 3, 2025. *United States v. Zachary Bird*, Case No. 8:24-cv-02580 and *United States v. Justin Pallet*, 5:22-cr-00035. She also has a federal guilty plea on February 7, 2025. *United States v. Kenneth Robinson*, 3:24-cr-00562. Counsel requests a brief extension due to these caseload issues.

Respectfully submitted,

/s/ Elizabeth Franklin-Best

Elizabeth Franklin-Best, P.C.
SC Bar #72555
3710 Landmark Drive, Suite 113
Columbia, South Carolina 29204
(803) 445-1333
elizabeth@franklinbestlaw.com

February 6, 2025

CERTIFICATE OF SERVICE

Counsel certifies that she has provided a copy of this motion to Danielle Dixon, of the South Carolina Attorney General's Office, via email on this date, February 6, 2025.

/s/ Elizabeth Franklin-Best

RECEIVED

Feb 06 2025

S.C. SUPREME COURT