

**RECEIVED**

**Feb 12 2025**

**S.C. SUPREME COURT**

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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Certiorari to Marion County

Honorable George M. McFaddin, Circuit Court Judge

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ERICK M. WILLARD,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2024-001837

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

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Counsel for Erick Maurice Willard respectfully requests an extension of thirty (30) days from February 12, 2025 until March 14, 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 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 Erick Maurice Willard 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 Writ of Certiorari to the Court of Appeals in the case of The State v. Bradley Mark Corlew with the Supreme Court on February 11, 2025. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Xzariera O. Gray with the Court of Appeals on February 6, 2025. Counsel filed the Petition for Writ of Certiorari in the case of Naijuwuan S. Chisolm v. The State with this Court on January 27, 2025. Counsel filed the Brief of Appellant and the Record on Appeal in the case of The State v. Michael David Morgan with the Court of Appeals on January 15, 2025. Counsel filed the Brief of Appellant and the Record on Appeal in the case of The State v. Jaylen Shyir Wilson with the Court of Appeals on January 13, 2025. Counsel filed the Initial Brief of Respondent and Designation of Matter in the case of Joshua Felipe Simmons v. The State with the Court of Appeals on January 10, 2025. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Brandan Richardson with the Court of Appeals on January 3, 2025. Counsel filed the Petition for Writ of Certiorari to the Court of Appeals in the case of Brian Foster v. The State with this Court on January 2, 2025. 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.


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

5. On January 31, 2025, 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 February 28, 2025.

WHEREFORE, the undersigned counsel would respectfully request a thirty (30) day extension from February 12, 2025 until March 14, 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 serving and 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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Sarah E. Shipe  
Appellate Defender

  
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Robert M. Dudek  
Chief Appellate Defender

This 12th day of February, 2025.