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Jun 18 2025

S.C. SUPREME COURT

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Richland County

Daniel M. Coble, Circuit Court Judge

BOUVIA SALES,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2025-000495

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.

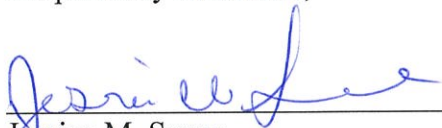
3. Counsel filed the Petition for Rehearing in the case of State v. Ariel Robinson with the Court of Appeals on June 12, 2025. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Jeffery Wise with the Court of Appeals on June 11, 2025. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Michael L. Faile with the Court of Appeals on April 23, 2025. Counsel filed the Anders Brief of Appellant and Record on Appeal in the case of The State v. David C. Mosley with the Court of Appeals on April 23, 2025. Counsel filed the Petition for Writ of Certiorari to the Court of Appeals in the case of Holly Jo Thompson v. The State with the Supreme Court on April 7, 2024. Counsel had an oral argument in the case of Mitchell Rivers v. State in the Supreme Court on April 2, 2025. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Calvin Ford with the Court of Appeals on March 20, 2025. Counsel filed the Johnson Petition for Writ of Certiorari and Appendix in the case of Bryant McKnight v. The State with the Supreme Court on March 7, 2025. Counsel filed the Anders Brief of Appellant and Record on Appeal in the case of The State v. Ryan Gist with the Court of Appeals on March 5, 2025. Counsel filed the petition for writ of certiorari and accompanying Appendix in the case of Matthew Pickens v. The State with the Court of Appeals on February 18, 2025.

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

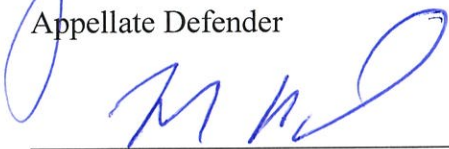
5. On May 30, 2025, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through June 30, 2025.

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 18th day of June, 2025.