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S.C. SUPREME COURT

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Greenville County

Patrick Cleburne Fant, III, Circuit Court Judge

MARK ANTHONY KEYS,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2024-002124

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.

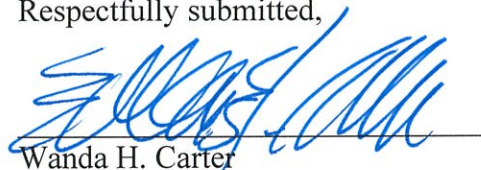
3. Counsel filed the Anders brief of appellant and record on appeal in the case of State v. Kentavious Agers with the Court of Appeals on July 9, 2025. Counsel filed the Anders brief of appellant and record on appeal in the case of State v. Kristopher Bagwell with the Court of Appeals on July 7, 2025. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of State v. Michael I. Mobley with the Supreme Court and Court of Appeals on June 23, 2025. Counsel had an oral argument in the case of State v. Jeremy S. Cornish in the Court of Appeals on June 11, 2025. Counsel filed the Anders brief of appellant and record on appeal in the case of State v. Kenneth Mitchell with the Court of Appeals on June 11, 2025. Counsel filed the Anders brief of appellant and record on appeal in the case of State v. Samuel S. Horton with the Court of Appeals on June 9, 2025. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Jonathan Lee Gray with the Court of Appeals on May 30, 2025. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of State v. Shanekia R. Garvin with the Supreme Court on May 19, 2025. Counsel filed the Anders brief of appellant and record on appeal in the case of State v. Derrick L. Tuten with the Court of Appeals on May 12, 2025. Counsel filed the petition for rehearing in the case of State v. Michael Mobley with the Court of Appeals on May 8, 2025.

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

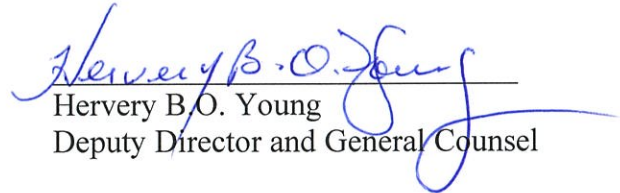
5. On June 27, 2025, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through July 31, 2025.

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,



Wanda H. Carter
Interim Chief Appellate Defender



Hervery B.O. Young
Deputy Director and General Counsel

This 10th day of July, 2025.