

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Beaufort County

Honorable Frank R. Addy, Jr., Circuit Court Judge

DALE E. KING,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2025-001062

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

Counsel for Dale Eugene King respectfully requests an extension of thirty (30) days from November 19, 2025 until December 19, 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 Dale Eugene King respectfully submits that extraordinary

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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.

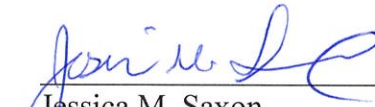
3. Counsel filed the Reply to Return to Petition for Writ of Certiorari to the Court of Appeals in the case of The State v. Terry S. Tyler with this Court on November 18, 2025. Counsel appeared for Oral Argument in the case of Maurice Anthony Odom v. The State before the Court of Appeals on November 6, 2025. Counsel filed the Petition for Writ of Certiorari, the Petition for Writ of Certiorari Pursuant to *Austin v. State*, and the Appendix in the case of Jamaques Salley v. The State with this Court on November 3, 2025. Counsel filed the Petition for Writ of Certiorari and the Appendix in the case of Charles S. Anderson v. The State with this Court on November 3, 2025. Counsel filed the Petition for Rehearing in the case of The State v. William Lee Roseboro, Jr. with the Court of Appeals on October 20, 2025. Counsel attended and presented at the mandatory Annual South Carolina Public Defender Conference in Myrtle Beach, South Carolina from October 6-8, 2025. Counsel filed the Brief of Appellant and the Record on Appeal in the case of The State v. Robert DeJesus with the Court of Appeals on October 2, 2025. Counsel filed the Petition for Writ of Certiorari to the Court of Appeals in the case of The State v. Terry S. Tyler with this Court on September 19, 2025. Counsel filed the Brief of Appellant and the Record on Appeal in the case of The State v. Alan G. Nix with the Court of Appeals on September 15, 2025. Counsel filed the Return to Petition for Rehearing in the case of Holly Jo Thompson v. The State with this Court on September 15, 2025. Counsel filed the Petition for Writ of Certiorari and the Appendix in the case of Keldrekus T. Oglesby v. The State with this Court on September 12, 2025.

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

5. On October 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 November 30, 2025.

WHEREFORE, the undersigned counsel would respectfully request a thirty (30) day extension from November 19, 2025 until December 19, 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,



Jessica M. Saxon
Appellate Defender



Wanda H. Carter
Chief Appellate Defender

This 19th day of November, 2025.