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Apr 15 2026

IN THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

APPEAL FROM CHESTERFIELD COUNTY
Court of General Sessions

S.C. SUPREME COURT

Appellate Case No. 2024-000461

The Honorable Paul M. Burch, Circuit Court Judge

STATE OF SOUTH CAROLINA,

Respondent

v.

MICHAEL LAMONT WATTS,

Petitioner.

MOTION FOR EXTENSION TO FILE PETITION FOR WRIT OF CERTIORARI

Undersigned counsel respectfully requests a two-week extension to file the petition for writ of certiorari for the petitioner's appeal to the Supreme Court. Counsel had an opening brief and appendix due on March 31, 2026 to the Fourth Circuit Court of Appeals for *United States v. Brenda Hunter*, 25-4472; a federal habeas petition filing on April 10, 2026, with the District Court of South Carolina for *Holmes Simpson-Davis v. Warden*, 5:26-cv-01505-JFA-KDW; a petitioner's reply brief also in the District Court of South Carolina for *Jerome Campbell v. Warden Terrie Wallace*, 8:25-cv-03808-MGL-WSB on April 8, 2026 ; a supplemental brief for a direct appeal in the United States Court of Appeals for the Seventh Circuit for *United States v. Sean E. Devonish, et. al.*, where counsel represents Keith Jones, 24-1291 on April 9th; and counsel's joint opening brief with the United States Court of Appeals for the District of Columbia Circuit for *United States*

v. Kenneth Harrelson, et.al., where counsel represents Elmer Stewart Rhodes, 23-3089 (although the Court just suspended the briefing schedule today, April 15, 2026).

The current due date is April 17, 2026. Counsel respectfully requests a due date of May 1, 2026.

Respectfully submitted,

/s/Elizabeth A. Franklin-Best
Elizabeth Franklin-Best, P.C.
3710 Landmark Drive, Suite 113
Columbia, South Carolina 29204
(803) 445-1333
elizabeth@franklinbestlaw.com

April 15, 2026.

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of April 2026, this Motion for an Extension was sent via email to Melody Brown, of the SC Attorney General's Office, at mbrown@scag.gov.

/s/ Elizabeth Franklin-Best

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