

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Marlboro County

Honorable S. B. Doby, Circuit Court Judge

ZAQUAI R. SHULER,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2026-000006

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

Counsel for Zaquai Shuler respectfully requests an extension of thirty (30) days from April 16, 2026 until May 18, 2026 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 Zaquai Shuler respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of

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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 appeared for Oral Argument in the case of Maurice Roberts v. State before the Supreme Court on April 1, 2026. Counsel appeared for Oral Argument in the case of The State v. Quinterris Carmichael before the Supreme Court on March 31, 2026. Counsel filed the Petition for Rehearing in the case of The State v. Marcus Wigfall with the Court of Appeals on March 26, 2026. Counsel filed the *Johnson* Petition for Writ of Certiorari and accompanying Appendix in the case of Jasper Jefferson v. State with the Supreme Court on March 23, 2026. Counsel filed the *Johnson* Petition for Writ of Certiorari and accompanying Appendix in the case of Tyrone Lorenza Robinson v. State with the Supreme Court on March 19, 2026. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Joshua D. Boston with the Court of Appeals on March 13, 2026. Counsel filed the Petition for Rehearing in the case of Herbert Holmes v. State with the Court of Appeals on March 12, 2026. Counsel appeared for Oral Argument in the case of The State v. Morgan Carr before the Court of Appeals on March 11, 2026. Counsel filed the *Johnson* Petition for Writ of Certiorari and accompanying Appendix in the case of Charles Tillman v. State with the Supreme Court on March 9, 2026.

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

5. On March 30, 2026, 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 May 1, 2026.

WHEREFORE, the undersigned counsel would respectfully request a thirty (30) day extension from April 16, 2026 until May 18, 2026 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,



Joanna K. Delany
Appellate Defender



Wanda H. Carter
Chief Appellate Defender

This 16th day of April, 2026.