

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Lexington County
R. Keith Kelly, Circuit Court Judge

RECEIVED

AUG 30 2019

S.C. SUPREME COURT

WILLIAM BROCKMEYER,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2019-000695

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

Counsel for petitioner respectfully requests an extension of thirty (30) days in which to 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 a 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 his caseload, counsel hopes that no further extension requests will be required.

3. Counsel filed the return to petition for rehearing in the case of The State v. Vladimir Pantovich with the Supreme Court on August 29, 2019. Counsel filed the brief of petitioner in the case of The State v. Robin Herndon with the Supreme Court on August 20, 2019. Counsel filed the Anders brief of appellant and designation of matter in the case of The State v. Michael Collins with the Court of Appeals on August 7, 2019. Counsel filed the return to petition for rehearing in the case of The State v. Anthony Martin with the Supreme Court on August 2, 2019. Counsel filed the brief of petitioner in the case of The State v. Michael Juan Smith with the Supreme Court on July 31, 2019. Counsel filed the brief of petitioner in the case of Robin Renee Herndon v. The State with the Supreme Court on July 29, 2019. Counsel filed the Anders brief of appellant and designation of matter in the case of The State v. Kenneth Campbell with the Court of Appeals on July 26, 2019. Counsel filed the return to petition for writ of certiorari to the Court of Appeals in the case of The State v. John Kenneth Massey, Jr. with the Supreme Court on July 5, 2019. Counsel filed the Anders brief of appellant and designation of matter in the case of The State v. Gene David Evans, Jr. with the Court of Appeals on July 3, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jeffrey Cromer v. The State with the Supreme Court on June 28, 2019.

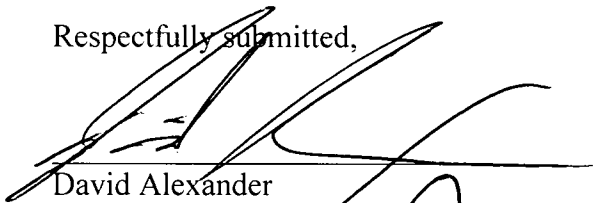
4. Counsel makes this request in good faith and not for purpose of delay.

5. Counsel for the Attorney General's office has been informed of this request.

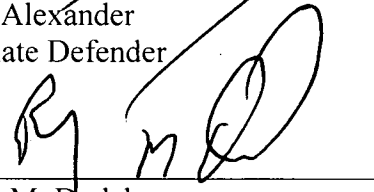
WHEREFORE, the undersigned counsel would respectfully request a thirty day extension, in which to file the petition for a writ of certiorari and appendix in this case based

upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,



David Alexander
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 30th day of August, 2019.

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

RECEIVED

AUG 30 2019

Appeal from Lexington County
R. Keith Kelly, Circuit Court Judge

S.C. SUPREME COURT

WILLIAM BROCKMEYER,

PETITIONER,

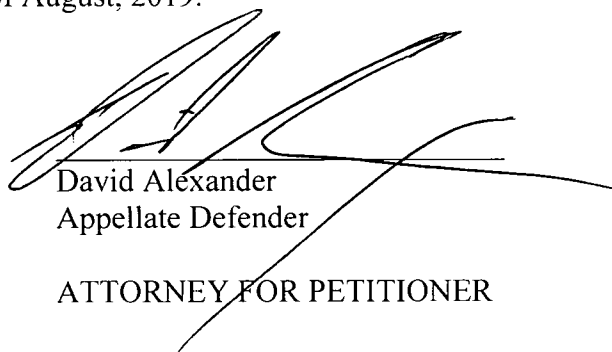
V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

CERTIFICATE OF SERVICE

I certify that a copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above referenced case has been served upon Taylor Z. Smith, Esquire, Assistant Attorney General, at the Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 30th day of August, 2019.



David Alexander
Appellate Defender
ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me
this 30th day of August, 2019.

Lindsey M. Matthews (L.S.)
Notary Public for South Carolina
My Commission Expires October 22, 2024.