

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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Appeal from Beaufort County

S.C. SUPREME COURT

Honorable Maite Murphy, Circuit Court Judge

Lower Court Case No. 2014-CP-07-02994
Appellate Case No. 2019-000529

Abdiyyah ben Alkebulanyahh, #6012
a/k/a Tyree Roberts,

PETITIONER,

v.

State of South Carolina,

RESPONDENT.

THIRD MOTION FOR EXTENSION OF TIME

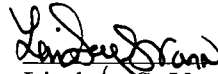
Petitioner, through undersigned counsel, respectfully requests the Court grant an extension of time in which to serve and file a Petition for Writ of Certiorari and Appendix, currently due to be filed on November 27, 2019. Specifically, undersigned counsel requests an additional thirty (30) days in which to file the Petition for Writ of Certiorari and Appendix. In support of this motion, the undersigned would show this Court:

- (1) This Court granted Petitioner's second extension request on October 23, 2019, extending the deadline to file and serve the Petition for Writ of Certiorari and the Appendix until November 27, 2019.

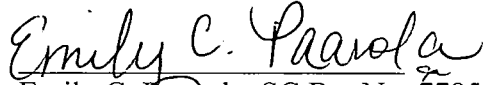
- (2) Undersigned counsel Lindsey Vann spent a significant portion of the past thirty (30) days preparing for an evidentiary hearing in the capital post-conviction relief case of *Aleksey v. State*, 2015-CP-38-764. The evidentiary hearing was scheduled to commence on November 6, 2019, though the judge notified counsel the hearing would be continued on November 5, 2019. Undersigned counsel has also completed significant investigation and preparation for in the capital post-conviction relief case of *Blackwell v. State*, No. 2018-CP-42-00928.
- (3) Over the past thirty (30) days, undersigned counsel Vann has drafted a petition for writ of certiorari and prepared the appendix in the capital post-conviction relief case of *Woods v. State*, No. 2019-001713.
- (4) On October 25, 2019, undersigned counsel Vann was appointed to the federal capital case of *U.S. v. Trevor Seward*, No. 4:19-mc-00351 and has spent significant time getting up to speed on that case and working with her new client.
- (5) Undersigned counsel Vann assisted new federal habeas counsel with preparing a motion for appointment of counsel and stay of execution after the denial of the petition for a writ of certiorari in the capital post-conviction relief appeal of *Stanko v. State*, No. 2017-002281.
- (6) At the time of undersigned counsel's appointment on this case, attorney Emily C. Paavola, agreed to assist on this case in a *pro bono* capacity. Ms. Paavola's involvement is limited by her other responsibilities and undersigned counsel Vann has primary responsibility for handling this case.

For the above reasons, which counsel believes constitute good cause under this Court's Order Dated March 18, 2009, undersigned counsel requests that this Court extend the deadline for filing the Petition for Writ of Certiorari and Appendix in this case an additional thirty (30) days.

Respectfully submitted,



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November 21st, 2019.

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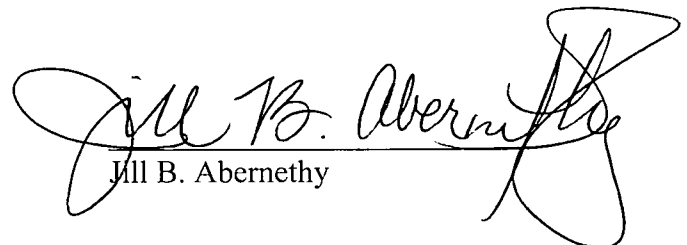
State of South Carolina,

RESPONDENT.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the Third Motion for Extension of Time was served by first class United States mail, postage prepaid, this 21st day of November, 2019, upon the following:

Melody Brown
William Joseph Maye
South Carolina Attorney General's Office
P.O. Box 11549
Columbia, SC 29211


Jill B. Abernethy