

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Appeal from Aiken County  
William P. Keesley, Circuit Court Judge

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RECEIVED

May 12 2020

S.C. SUPREME COURT

GARY JERRELL MEANS, JR.,

PETITIONER,

V.

THE STATE,

RESPONDENT.

APPELLATE CASE NO. 2019-000617

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

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Counsel for Gary Jerrell Means, Jr. respectfully requests a **final thirty (30) day extension, until June 11, 2020**, 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 third 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. The Court has granted counsel two previous extensions.

2. Counsel for Gary Jerrell Means, Jr. 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 her caseload, counsel hopes that no further extension requests will be required.

3. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Candice R. Beasley v. The State with this Court on May 4, 2020. Counsel filed the petition for writ of certiorari and accompanying appendices in the case of Curtis T. Johnson v. The State with this Court on April 15, 2020. Counsel filed the Anders brief of appellant and designation of matter in the case of The State v. Richard Douglas Waldrup with the Court of Appeals on April 2, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Booker T. Hill v. The State with this Court on March 11, 2020. Counsel had an oral argument before the Court of Appeals on March 10, 2020 in the case of The State v. Jermaine Marquel Bell. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Worth Edward Cook v. The State with this Court on March 9, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Stanley Wright v. The State with this Court on March 4, 2020.

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

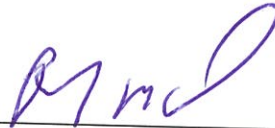
5. Opposing counsel, the Attorney General's Office, has graciously consented to this extension request by way of the thirty-day general consent granted by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through May 21, 2020. That emailed general consent was dated April 21, 2020.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until June 11, 2020**, in which to file the Petition for Writ of Certiorari and Appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the Petition for Writ of Certiorari and Appendix be held in abeyance pending a ruling on this motion.

This 12th day of May, 2020.

Respectfully submitted,

s/ Sarah E. Shipe  
Sarah Shipe  
Appellate Defender



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Robert M. Dudek  
Chief Appellate Defender