

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Appeal from Beaufort County
R. Ferrell Cothran, Circuit Court Judge

RECEIVED

May 13 2020

S.C. SUPREME COURT

RODNEY GALIMORE,

PETITIONER,

V.

THE STATE,

RESPONDENT.

APPELLATE CASE NO. 2019-001338

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

Counsel for Rodney Galimore respectfully requests a **final thirty (30) day extension, until June 12, 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 Rodney Galimore 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 Initial Brief and Designation of Matter in the case of State v. Curnez Ellerbee in the Court of Appeals on May 8, 2020. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Marcus A. Nelson v. State in this Court on April 27, 2020. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Timothy Montez Wright v. State in this Court on April 23, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Christopher Heller v. State in this Court on April 15, 2020. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Santos Aguilera v. State in this Court on April 3, 2020.

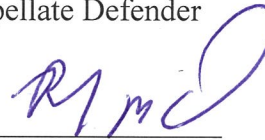
4. Counsel makes this request in good faith and not for purpose of delay. Opposing counsel, the Attorney General's Office, has graciously consented to this extension request by way of the thirty day general consent granted by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions 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 12, 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 13th day of May, 2020.

Respectfully submitted,

s/ Joanna K. Delany
Joanna K. Delany
Appellate Defender



Robert M. Dudek
Chief Appellate Defender