

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Richland County

Honorable J. Derham Cole, Circuit Court Judge

**RECEIVED**

**Jun 26 2020**

S.C. SUPREME COURT

TIRRELL BOYD,

PETITIONER,

V.

STATE OF SOUTH CAROLINA

RESPONDENT

APPELLATE CASE NO. 2019-001999

\_\_\_\_\_  
MOTION FOR EXTENSION TO FILE  
PETITION FOR WRIT OF CERTIORARI  
AND ACCOMPANYING APPENDIX  
\_\_\_\_\_

The undersigned counsel respectfully requests a **final thirty-day extension, until July 27, 2020** in which to file the petition for writ of certiorari and accompanying appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The petition for writ of certiorari and accompanying appendix in this case are due to be served and filed today.

2. Counsel filed the initial brief of appellant in the case of The State v. Amy Taylor on June 15, 2020 with the Court of Appeals. Counsel filed the petition for writ of certiorari in the case of Christian Rollins v. The State on June 9, 2020 with the Supreme Court. Counsel filed the petition for writ of certiorari in the case of Sylvester Johnson v. The State on June 9, 2020 with the Supreme Court. Counsel filed the petition for writ of certiorari in the case of Dashon Garner

v. The State on May 26, 2020 with the Supreme Court. Counsel filed the petition for writ of certiorari in the case of John Haynes v. The State on May 14, 2020 with the Supreme Court. Counsel filed the petition for writ of certiorari in the case of Gerald Green v. The State on May 5, 2020 with the Supreme Court. Counsel filed the initial brief of appellant in the case of The State v. Mario Moise on April 13, 2020 with the Court of Appeals.

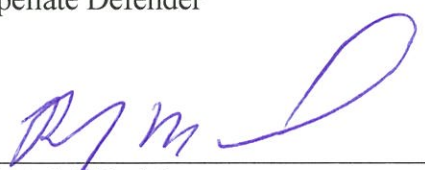
3. Opposing counsel, the Attorney General's Office, has graciously consented to this extension request by way of the thirty-day general consent granted by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through June 30, 2020.

4. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty-day extension, until July 27, 2020**. Counsel respectfully requests that the time limits for filing the petition for writ of certiorari and accompanying appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,

s/Jessica M. Saxon  
Jessica M. Saxon  
Appellate Defender

  
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Robert M. Dudek  
Chief Appellate Defender

June 26, 2020