

RECEIVED

Aug 03 2020

S.C. SUPREME COURT

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Lexington County

Honorable Walton J. McLeod, IV, Circuit Court Judge  
\_\_\_\_\_

JAMES WILLIAMS,

PETITIONER,

V.

STATE OF SOUTH CAROLINA

RESPONDENT

APPELLATE CASE NO. 2019-001608  
\_\_\_\_\_

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

The undersigned counsel respectfully requests a **final twenty-one day extension, until August 24, 2020** in which to file the petition for writ of certiorari and accompanying appendix in the above-referenced case. **Counsel will file the petition for writ of certiorari and appendix before the deadline if possible.** 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 had an emergency medical situation and was hospitalized on August 2, 2020, which has necessitated the need for a fourth and final twenty-one day extension in this case.** Counsel filed the petition for writ of certiorari in the case of Tervin Goodman v. The State on July 29, 2020 with this Court. Counsel filed the petition for writ of certiorari in the case

of Tirrell Boyd v. The State on July 24, 2020 with this Court. Counsel filed the petition for writ of certiorari in the case of Rashad Johnson v. The State on July 22, 2020 with this Court. Counsel filed the return petition for writ of certiorari in the case of Marie Faltas v. The State on July 9, 2020 with this Court. Counsel filed the petition for writ of certiorari in the case of Danielle Peay v. The State on July 1, 2020 with this Court. 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 this Court. Counsel filed the petition for writ of certiorari in the case of Sylvester Johnson v. The State on June 9, 2020 with this Court. Counsel filed the petition for writ of certiorari in the case of Dashon Garner v. The State on May 26, 2020 with this Court. Counsel filed the petition for writ of certiorari in the case of John Haynes v. The State on May 14, 2020 with this Court.

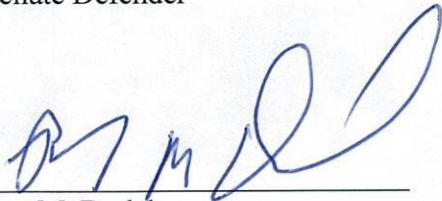
3. Opposing counsel, the Attorney General's Office, has graciously consented to this extension request by way of the thirty-day general consent granted by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through August 31, 2020.

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 twenty-one day extension, until August 24, 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

  
Robert M. Dudek  
Chief Appellate Defender

August 3, 2020