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Aug 07 2020

S.C. SUPREME COURT

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Clarendon County

Honorable Kristi F. Curtis, Circuit Court Judge

ROOSEVELT SABB, JR.,

PETITIONER,

V.

STATE OF SOUTH CAROLINA

RESPONDENT

APPELLATE CASE NO. 2019-001990

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

The undersigned counsel respectfully requests a **final thirty-day extension, until September 7, 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 and designation of matter in the case of The State v. Glen Waldrop with the Court of Appeals on July 27, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Ronnie Bonner with the Court of Appeals on July 27, 2020. Counsel filed the brief of respondent in the case of The State v. Ontario Makins with the Supreme Court on July 2, 2020. Counsel filed the initial brief of

appellant and designation of matter in the case of The State v. Yolanda Shatten with the Court of Appeals on June 25, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Michael Strother with the Court of Appeals on June 25, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Risheen Rich with the Court of Appeals on June 25, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Quincy McCants v. The State with the Supreme Court on June 22, 2020. Counsel filed the brief of petitioner in the case of Michael Rogers v. The State with the Court of Appeals on May 28, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Martin Pittman with the Court of Appeals on May 27, 2020.

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.

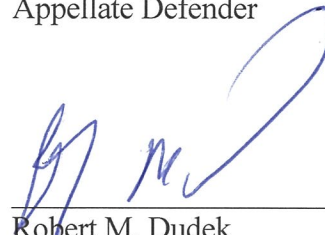
4. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty-day extension, until September 7, 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/Taylor D. Gilliam _____

Taylor D. Gilliam
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

August 7, 2020