

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Union County

RECEIVED
Aug 28 2020
S.C. SUPREME COURT

Honorable Michael G. Nettles, Circuit Court Judge

CLEVELAND EDWARD YOUNG,

PETITIONER,

V.

STATE OF SOUTH CAROLINA

RESPONDENT

APPELLATE CASE NO. 2020-000367

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 28, 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 petition for writ of certiorari and brief pursuant to White v. State in the case of James Williams v. The State on August 24, 2020 with the Supreme Court. Counsel filed the petition for writ of certiorari in the case of George Moses v. The State on August 17, 2020 with the Court of Appeals. Counsel filed the petition for writ of certiorari in the case of Jennifer Dale v. The State on August 12, 2020 with the Supreme Court. Counsel filed the

petition for writ of certiorari in the case of Tirrell Boyd v. The State on July 24, 2020 with the Supreme Court. Counsel filed the petition for writ of certiorari in the case of Rashad Johnson v. The State on July 22, 2020 with the Supreme Court. Counsel filed the return petition for writ of certiorari in the case of Marie Faltas v. The State on July 9, 2020 with the Supreme Court. Counsel filed the petition for writ of certiorari in the case of Danielle Peay v. The State on July 1, 2020 with the Supreme 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.


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 28, 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 28, 2020