

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Appeal from Spartanburg County

G. Thomas Cooper, Circuit Court Judge

RECEIVED

Oct 08 2020

S.C. SUPREME COURT

GENUINE TRUTH BANNER,

PETITIONER,

V.

THE STATE,

RESPONDENT.

APPELLATE CASE NO. 2020-000781

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

Counsel for Genuine Truth Banner respectfully requests a **final thirty (30) day extension, from Thursday, October 8, 2020 until November 9, 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, October 8, 2020. The Court has granted counsel two previous extensions.
2. Counsel for Genuine Truth Banner 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 petition for writ of certiorari and accompanying appendix in the case of Gary R. Thompson v. The State with this Court on October 1, 2020. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Jonathan Johnson v. The State with this Court on September 23, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Rickey Dean Tate with the Court of Appeals on September 16, 2020. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Rashawn Tremayne Carson v. The State with this Court on September 8, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Travis A. Lee v. The State with this Court on September 8, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Jeffery James Williams with the Court of Appeals on September 2, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Joe Lewis Holmes v. The State with this Court on August 28, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Elizabeth Leanne Howze with the Court of Appeals on August 26, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Sterling Maybin with the Court of Appeals on August 25, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Lorenzo A. Jackson v. The State with this Court on August 21, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Tony Fulmer v. The State with this Court on August 5, 2020.

4. Counsel makes this request in good faith and not for purpose of delay.

5. Opposing counsel, the Attorney General's Office, has graciously consented to this extension request by way of the extended thirty-day general consent granted by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through October 31, 2020. That extended, emailed general consent was dated September 28, 2020.

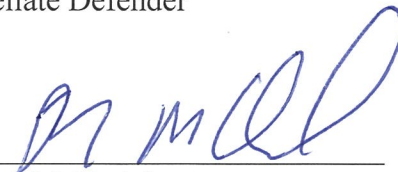
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, from Thursday, October 8, 2020 until November 9, 2020**, in which to file the Petition for Writ of Certiorari and Appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the Petition for Writ of Certiorari and Appendix be held in abeyance pending a ruling on this motion.

This 8th day of October, 2020.

Respectfully submitted,



Sarah Shipe
Appellate Defender



Robert M. Dudek
Chief Appellate Defender