

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Certiorari to Lexington County
Eugene C. Griffith, Circuit Court Judge

RECEIVED

Oct 09 2020

SC Court of Appeals

WILLIAM BRUCE JUSTICE,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

**MOTION FOR EXTENSION TO FILE
BRIEF OF PETITIONER**

The undersigned counsel would respectfully request a **final thirty-day extension until November 9, 2020** in which to file the brief of petitioner in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following exigent circumstances:

1. The brief of petitioner in this case is due to be served and filed today, having been extended by two prior orders of this Court.
2. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Johnathon Phillips v. The State with the Supreme Court on October 5, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of Sidney Moorner v. The State with the Court of Appeals on October 5, 2020. Counsel attended the Annual Public Defender Conference from Monday, September 21- Wednesday, September 23, 2020. Counsel filed

the petition for writ of certiorari and accompanying appendix in the case of Roosevelt Sabb v. The State with the Supreme Court on September 8, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of Jordan Hodge v. The State with the Court of Appeals on September 8, 2020. Counsel filed the petition for rehearing in the case of Justin Hillerby v. The State with the Court of Appeals on September 3, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. John Linen with the Court of Appeals on August 27, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Robert Garrett with the Court of Appeals on August 21, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Miranda Taylor with the Court of Appeals on August 19, 2020. Counsel filed the return to petition for writ of certiorari to the court of appeals in the case of Michael Elders v. The State with the Supreme Court on August 10, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Miranda Taylor with the Court of Appeals on August 7, 2020.

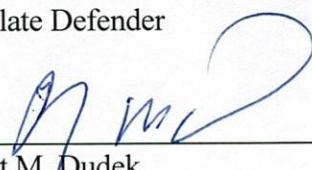
3. This request is made in good faith, and not for purposes of delay.
4. Opposing counsel, the Attorney General's Office, has graciously consented to this extension request by way of the thirty-day general consent granted by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through October 31, 2020.

WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension in which to file the brief of petitioner in this case. Counsel requests that the time limits for filing the brief of petitioner 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

October 9, 2020