

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Orangeburg County

Honorable Edgar W. Dickson, Circuit Court Judge

**RECEIVED**

**Oct 23 2020**

**S.C. SUPREME COURT**

ADRIENNE SABRINA RANDOLPH,

PETITIONER,

V.

STATE OF SOUTH CAROLINA

RESPONDENT

APPELLATE CASE NO. 2020-000788

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

The undersigned counsel respectfully requests a **final thirty-day extension, until November 23, 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 in the case of Cleveland Young v. The State on September 28, 2020 with the Supreme Court. Counsel attended the Annual Public Defender Conference from Monday, September 21- Wednesday, September 23, 2020. Counsel filed the petition for writ of certiorari in the case of Tito Marin v. The State on September 21, 2020 with the Supreme Court. Counsel filed the brief of petitioner in the case of John Mack v.

The State on September 18, 2020 with the Supreme Court. 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.

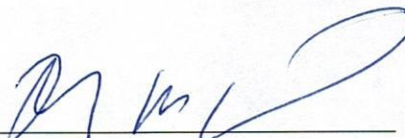
3. Opposing counsel, the Attorney General's Office, has graciously consented to this extension request by way of the thirty-day general consent granted by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through October 31, 2020.

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 November 23, 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

October 23, 2020