

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT  
\_\_\_\_\_  
Certiorari to Spartanburg County

**RECEIVED**  
**Oct 30 2020**  
S.C. SUPREME COURT

Honorable G. Thomas Cooper, Circuit Court Judge  
\_\_\_\_\_

LARRY D. BROWN,

PETITIONER,

V.

STATE OF SOUTH CAROLINA

RESPONDENT

APPELLATE CASE NO. 2020-000824  
\_\_\_\_\_

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 30, 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 Anthony Mays v. The State with the Court of Appeals on October 28, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of Johnathan Bright v. The State with the Court of Appeals on October 28, 2020. Counsel filed the petition for writ of certiorari to the Court of Appeals with the Supreme Court on October 21, 2020. Counsel filed the petition for

writ of certiorari and accompanying appendix in the case of Gerald Haltiwanger v. The State with this Court on October 14, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Johnathon Phillips v. The State with this Court on October 5, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of Sidney Moorer 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 this 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.

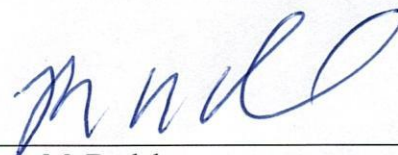
3. Opposing counsel, the Attorney General's Office, has graciously consented to this extension request by way of the thirty-day general consent granted by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through October 31, 2020.

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 30, 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

October 30, 2020