

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Saluda County

Honorable J. Derham Cole, Circuit Court Judge

RECEIVED

Dec 30 2020

S.C. SUPREME COURT

DAVID ANDREW BOWERS,

PETITIONER,

V.

STATE OF SOUTH CAROLINA

RESPONDENT

APPELLATE CASE NO. 2020-001000

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

Counsel for David Andrew Bowers respectfully requests an extension of thirty (30) days 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 second 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.
2. Counsel for David Andrew Bowers 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 initial brief of appellant in the case of The State v. Anthony Craven on December 9, 2020 with the Court of Appeals. Counsel filed the petition for writ of certiorari in the case of Adrienne Randolph v. The State on November 23, 2020 with this Court. Counsel filed the petition for writ of certiorari in the case of Trevin Milledge v. The State on October 28, 2020 with this Court. Counsel filed the initial brief of appellant in the case of The State v. Anthony Davis on October 26, 2020 with the Court of Appeals. Counsel filed the petition for writ of certiorari in the case of Cleveland Young v. The State on September 28, 2020 with this 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 this Court. Counsel filed the brief of petitioner in the case of John Mack v. The State on September 18, 2020 with this Court.

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

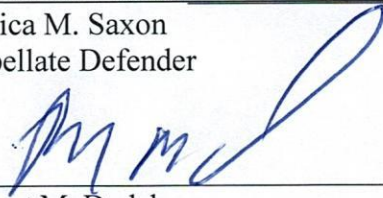
5. Counsel for the Attorney General's office has been informed of this request via electronic mail.

WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension, 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 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

December 30, 2020

Attorney for Petitioner