

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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S.C. SUPREME COURT

\_\_\_\_\_  
Certiorari to Lexington County  
J. Derham Cole, Circuit Court Judge  
\_\_\_\_\_

RODERQUIZ COOK,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2020-000972  
\_\_\_\_\_

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

The undersigned counsel would respectfully request an **additional eight business day extension, until Thursday, January 14, 2021**, 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 fourth request for an extension. **Counsel will file the certiorari petition before this requested deadline if possible.** In support of this request, counsel shows:

1. The petition for writ of certiorari and appendix are due to be filed with the Court today. The Court has granted counsel three previous extensions. The appendix in this case is eleven hundred an eighty-two (1182) pages long.

2. The undersigned counsel respectfully submits that special extraordinary circumstances exist which warrant the granting of an additional extension of time. Counsel was

given recent specific research and writing responsibilities in a murder case by the Chief Appellate Defender where undersigned counsel is serving as co-counsel. The assigned work on that murder case with the Chief Appellate Defender delayed counsel's ability to timely file the petition for a writ of certiorari in this case.

3. Counsel filed the Anders brief of appellant and record on appeal in the case of State v. Edward Lee Washington with the Court of Appeals on March 4, 2020. Counsel filed the Anders brief of appellant and record on appeal in the case of State v. Johnny Tyler Padgett in the Court of Appeals on March 4, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Stephen Douglas Berry v. State with the Supreme Court on February 26, 2020. Counsel filed the Anders brief of appellant and record on appeal in the case of State v. Courtney A. Smith with the Court of Appeals on February 20, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Frankie Lee Davis, III, with the Court of Appeals on February 5, 2020. Counsel filed the Anders brief of appellant and record on appeal in the case of State v. Ansel Bradley Wallen with the Court of Appeals on February 3, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Keith Sheldon Levan v. State with the Supreme Court on December 27, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Andre Tayson Boone v. State with the Supreme Court on December 9, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Joshua CW Reher with the Court of Appeals on December 2, 2019. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of James Trapp v. State with the Supreme Court on November 27, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Victor Smith v. State with the Supreme Court on November

27, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of Ben Reed, IV. v. State with the Court of Appeals on November 8, 2019.

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

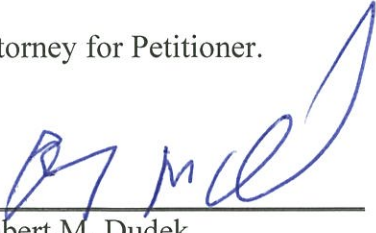
5. Counsel for the Attorney General's office consents to this request as shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request an **additional eight business day extension, until Thursday, January 14, 2021**, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances. **Counsel will file the petition for a writ of certiorari before that requested deadline if possible.** Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,

s/Adam Sinclair Ruffin  
Adam Sinclair Ruffin  
Appellate Defender

Attorney for Petitioner.

  
Robert M. Dudek  
Chief Appellate Defender