

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Certiorari to Chesterfield County

Roger E. Henderson, Circuit Court Judge

MITCHELL RIVERS,

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 March 5, 2021** 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 Motion to Hold Appeal in Abeyance and Motion to Remand for Reconstruction of Post-Conviction Relief Hearing in the case of Jacoby Fields v. The State on January 11, 2021. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Leonard Brockington v. The State with the Supreme Court on January 4, 2021. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jamison Holmes v. The State with the Supreme

Court on December 30, 2020. Counsel filed the reply to return to petition for writ of certiorari and accompanying appendix in the case of Quincy McCants v. The State with the Supreme Court on December 21, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of Deipo Lewin v. The State with the Court of Appeals on December 14, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of Daquan Crummey v. The State with the Court of Appeals on December 9, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Timothy Head v. The State with the Supreme Court on December 4, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of Christopher Saunders v. The State with the Court of Appeals on December 1, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Larry Brown v. The State with the Supreme Court on November 30, 2020.

This request is made in good faith, and not for purposes of delay.

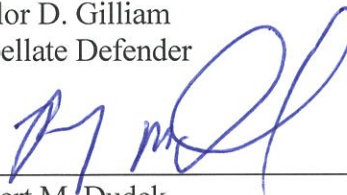
4. Opposing counsel, the Attorney General's Office, has graciously consented to this extension request by way of the thirty-day general consent granted by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through February 28, 2021.

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

February 3, 2021