

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
Hon. Jocelyn J. Newman, Circuit Judge

Appellate Case No.: 2020-000591

RECEIVED
FEB 24 2021
S.C. SUPREME COURT

DeQuan Vereen Appellant-Petitioner,

v.

The State of South Carolina Appellee-Respondent.

**MOTION FOR EXTENSION OF TIME TO FILE JOHNSON
RESPONSE PETITION FOR WRIT OF CERTIORARI**

To: Ms. Lindsey A. McCallister, Asst. Att’y. General, Attorney for Respondent.

I, DeQuan Vereen, proceeding as pro-se, would respectfully moves this court for an extension of thirty (30) days in which to file Petitioner’s Johnson Pro-se Response Petition for Writ of Certiorari in this case. This motion is made pursuant to an Order of the South Carolina Supreme Court dated January 25, 2021. (See Exhibit – A). The Petitioner moves that the time for filing be extended to March 22, 2021. This a second request for an extension. This motion is made because the Petitioner has not been able to properly perfect his Johnson Response Petition for Writ of Certiorari within the allotted time for the following reason:

1. The Petition for Writ of Certiorari is due to be served and filed with the Court on February 18, 2021.
2. The Petitioner has only a G.E.D., with no legal education and is just a layman of law.

3. Petitioner respectfully submits that extraordinary circumstances exist which warrants the granting of an additional extension of time. Petitioner has only limited access to the law library here at Lieber Correctional Institution.
4. The limited access hinders Petitioner's time to do legal research, to get legal material and assistance to properly prepare his Johnson Response Petition for Writ of Certiorari.
5. The Petitioner has limited knowledge of the law and hopes that no further requests will be required.
6. Petitioner makes this request in good faith and not for purpose of delay.
7. Good cause exists for the granting of this motion for extension of time, for the reasons stated above. The limited access to the law library for the reasons here at this institution, hinders Petitioner from making a timely fashioned Petition Writ of Certiorari.

WHEREFORE, the Petitioner would respectfully request a thirty-day extension, in which to properly perfect and file his Johnson Response Petition for Writ of Certiorari in this case based upon the above exigent circumstances. Petitioner requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

RESPECTFULLY SUBMITTED on this 16 day of February, 2021.

Dequan Vereen
DeQuan Vereen, # 364939, Pro-se
Lieber Correctional Institution
136 Wilborn Ave.
Ridgeville, S.C. 29472

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