

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Spartanburg County

Honorable J. Derham Cole, Circuit Court Judge

RECEIVED

Mar 08 2021

S.C. SUPREME COURT

KARRAS CASCELLE COHEN,

PETITIONER,

V.

STATE OF SOUTH CAROLINA

RESPONDENT

APPELLATE CASE NO. 2020-001417

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

Counsel for Karras Cascelle Cohen 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 Karras Cascelle Cohen 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 his caseload, counsel hopes that no further extension requests will be required.

3. Counsel had an oral argument in the case of John Mack v. The State on March 3, 2021 with this Court. Counsel filed the petition for writ of certiorari in the case of David Bowers v. The State on January 29, 2021 with this Court. 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.

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

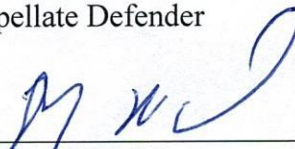
5. Counsel for the Attorney General's office has been informed of this request via electronic mail.

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

Attorney for Petitioner

March 8, 2021