

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to York County  
Daniel D. Hall, Circuit Court Judge

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Apr 19 2021

S.C. SUPREME COURT

DENNIS RODGER DAVIS, JR.,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2020-001116

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MOTION FOR AN EXTENSION TO SERVE AND FILE  
THE PETITION FOR WRIT OF CERTIORARI  
AND APPENDIX

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Counsel for Dennis Rodger Davis, Jr., respectfully requests a **third and final thirty (30) day extension, until May 19, 2021**, in which to serve and file the Petition for Writ of Certiorari and Appendix in the above-referenced case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The Petition for Writ of Certiorari and Appendix are due to be served and filed with the Court today. The Court has granted counsel two previous extensions.
2. Counsel for Dennis Rodger Davis, Jr., 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 reply brief of appellant in the case of The State v. Anthony C. Davis on March 19, 2021 with the Court of Appeals. Counsel had an oral argument in the case of John Mack v. The State on March 3, 2021 with the Supreme Court.

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

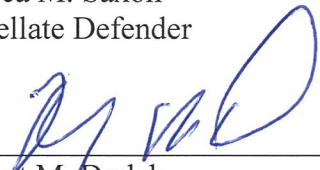
5. On March 30, 2021, opposing counsel, the Attorney General's office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through April 30, 2021.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until May 19, 2021**, in which to serve and file the Petition for Writ of Certiorari and Appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for serving and filing the Petition for Writ of Certiorari and Appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,

s/Jessica M. Saxon

Jessica M. Saxon  
Appellate Defender



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Robert M. Dudek  
Chief Appellate Defender

This 19<sup>th</sup> day of April, 2021.