

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

RECEIVED
May 13 2021
S.C. SUPREME COURT

Certiorari to Colleton County

Honorable R. Lawton McIntosh, Circuit Court Judge

ANTHONY TEREZ BROWN,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2021-000103

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

Counsel for Anthony Terez Brown 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 Anthony Terez Brown 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 petition for writ of certiorari in the case of Dennis Rodger Davis, Jr. v. The State on May 4, 2021 with the Supreme Court. Counsel filed the amended petition for writ of certiorari in the case of Adrienne Randolph v. The State on April 12, 2021 with the Supreme Court. Counsel filed the petition for writ of certiorari in the case of Karras Cascelle Cohen, Jr. v. The State on April 7, 2021 with the Supreme Court. 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.

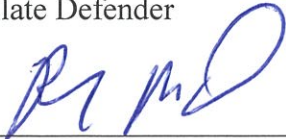
4. Counsel makes this request in good faith and not for purpose of delay.

5. On April 29, 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 May 31, 2021.

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 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



Robert M. Dudek
Chief Appellate Defender

This 13th day of May, 2021.