

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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Jun 10 2021

S.C. SUPREME COURT

Certiorari to Florence County

Honorable D. Craig Brown, Circuit Court Judge

WILLIAM TYREL FLEMMING,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2020-001517

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

Counsel for William Tyrel Flemming, respectfully requests a **third and final thirty (30) day extension, until July 12, 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 William Tyrel Flemming, 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.

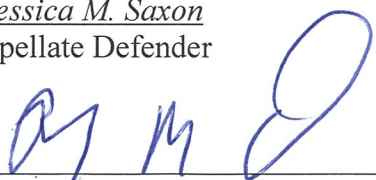
3. Counsel filed the brief of appellant in the case of The State v. Francisco Saul Ortiz-Aguirre on June 4, 2021 with the Court of Appeals. Counsel filed the petition for writ of certiorari in the case of Levell Grant v. The State on May 11, 2021 with the Supreme Court. Counsel filed the petition for 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 makes this request in good faith and not for purpose of delay.

4. On May 28, 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 June 30, 2021.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until July 12, 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
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 10th day of June, 2021.