

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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Jun 14 2021

S.C. SUPREME COURT

Certiorari to Richland County

Honorable D. Craig Brown, Circuit Court Judge

MICHAEL DARNELL THOMAS,

PETITIONER,

V.

STATE OF SOUTH CAROLINA

RESPONDENT

APPELLATE CASE NO. 2020-001492

MOTION FOR EXTENSION TO FILE
PETITION FOR WRIT OF CERTIORARI
AND ACCOMPANYING APPENDIX

The undersigned counsel respectfully requests a **final thirty-day extension, until July 14, 2021**, in which to file the petition for writ of certiorari and accompanying appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The petition for writ of certiorari and accompanying appendix in this case are due to be served and filed today.

2. Counsel filed the return to petition for writ of certiorari in the Court of Appeals in the case of In the Interest of Christopher H. v. The State with this Court on June 1, 2021. Counsel filed the reply brief of petitioner in the case of William Justice v. The State with the Court of Appeals on May 24, 2021. Counsel filed the brief of petitioner in the case of Mack

Washington v. The State with the Court of Appeals on May 21, 2021. Counsel filed the reply brief of petitioner in the case of Mitchell Rivers v. The State with the Court of Appeals on May 11, 2021. Counsel filed the Reply Brief of Petitioner in the case of Dameion Rivers v. The State with the Court of Appeals on April 21, 2021. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Alfonso Morgan v. The State with this Court on March 31, 2021. Counsel had an oral argument in the case of The State v. Ontario Stefon Patrick Makins before this Court on March 24, 2021. Counsel filed the brief of petitioner in the case of Mitchell Rivers v. The State with the Court of Appeals on March 5, 2021. Counsel had an oral argument in the case of Victor Weldon v. The State before the Court of Appeals on March 1, 2021.

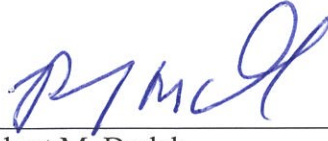
3. Opposing counsel, the Attorney General's Office, has graciously consented to this extension request by way of the thirty-day general consent granted by email from Deputy Attorney General Donald J. Zelenka dated May 28, 2021 for all Appellate Defense extensions through June 30, 2021.

4. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty-day extension, until July 14, 2021**. Counsel respectfully requests that the time limits for filing the petition for writ of certiorari and accompanying appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,

s/ Taylor D. Gilliam
Taylor D. Gilliam
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

June 14, 2021