

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Jul 19 2021

S.C. SUPREME COURT

Certiorari to Williamsburg County

Honorable George M. McFaddin, Circuit Court Judge

LEVERN MCCREA,

PETITIONER,

V.

STATE OF SOUTH CAROLINA

RESPONDENT

APPELLATE CASE NO. 2020-001426

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

The undersigned counsel respectfully requests a **final thirty-day extension, until August 18, 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 reply to return to petition for writ of certiorari in the case of Dennis Cumbee, Jr. v. State of South Carolina with this Court on July 16, 2021. Counsel filed the petition for rehearing in the case of Michael Anthony Rogers v. State of South Carolina with the Court of Appeals on July 15, 2021. Counsel filed the petition for writ of certiorari and accompanying

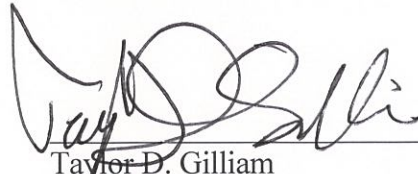
appendix in the case of Michael Darnell Thomas v. State of South Carolina with this Court on July 14, 2021. Counsel filed the Anders brief pursuant to White v. State in the case of Johnny Gregg v. State of South Carolina with this Court on June 25, 2021. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Johnny Gregg v. State of South Carolina with this Court on June 25, 2021. Counsel filed the Anders brief of appellant and designation of matter in the case of The State v. Timothy William Pyle with the Court of Appeals on June 24, 2021. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Terrell Denard Knightner with the Court of Appeals on June 23, 2021. Counsel filed the brief of respondent in the case of Michael Elders v. State of South Carolina with this Court on June 17, 2021. 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.

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 June 28, 2021 for all Appellate Defense extensions through July 31, 2021.

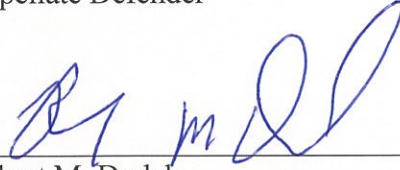
4. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty-day extension, until August 18, 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,

A handwritten signature in black ink, appearing to read "Taylor D. Gilliam", written over a horizontal line.

Taylor D. Gilliam  
Appellate Defender

A handwritten signature in blue ink, appearing to read "Robert M. Dudek", written over a horizontal line.

Robert M. Dudek  
Chief Appellate Defender

July 19, 2021