

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Beaufort County

Brooks P. Goldsmith, Circuit Court Judge  
\_\_\_\_\_

**RECEIVED**

**Jul 21 2021**

S.C. SUPREME COURT

TRAVIS ABE POLITE,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2021-000241  
\_\_\_\_\_

**PETITION FOR EXTENSION OF TIME TO FILE  
PETITION FOR WRIT OF CERTIORARI  
AND APPENDIX**  
\_\_\_\_\_

The undersigned counsel respectfully requests a thirty-day extension in which to file the petition for writ of certiorari and appendix in the above-referenced case. In support of this motion, counsel respectfully shows the Court the following exigent circumstances:

1. The petition for writ of certiorari and appendix in this case are due to be served and filed today, having been extended by one prior order of this Court.
2. Counsel filed the brief of petitioner and appendix in the case of State v. Angela D. Brewer in the Supreme Court on July 16, 2021. Counsel presented at the Blues Bar-B-Q and Bar CLE sponsored by the South Carolina Association of Criminal Defense Lawyers on the topic “Considering Current Cases Part III” on July 9, 2021. Counsel filed a petition for rehearing in the

case of State v. Robert Lee Miller, III in the Court of Appeals on July 1, 2021. Counsel, along with co-counsel, filed the initial reply brief of appellant in the case of State v. Timothy Ray Jones, Jr. in the Supreme Court on June 30, 2020. Counsel filed the initial reply brief of appellant in the case of State v. Samuel Lamar Burnside in the Court of Appeals on June 24, 2021. Counsel participated in hearings as a member of the Committee on Character and Fitness on June 23, 2021. Counsel had an oral argument in the case of State v. James Elbert Daniels, Jr. in the Court of Appeals on June 15, 2021. Counsel participated in hearings as a member of the Committee on Character and Fitness on June 3, 2021. Counsel filed the initial reply brief of appellant in the case of State v. Kayla Cook in the Court of Appeals on May 26, 2021.

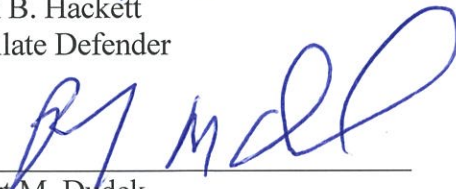
3. This request is made in good faith, and not for purposes of delay.

WHEREFORE, the undersigned counsel respectfully requests a thirty-day extension in which to file the petition for writ of certiorari and appendix in this case. Counsel requests that the time limits for filing the petition for writ of certiorari be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Susan B. Hackett  
Appellate Defender



Robert M. Dudek  
Chief Appellate Defender

July 21, 2021