

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Anderson County

Letitia H. Verdin, Circuit Court Judge  
\_\_\_\_\_

**RECEIVED**

**Jul 29 2021**

S.C. SUPREME COURT

RANDALL M. SIMPSON,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2021-000350  
\_\_\_\_\_

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

The undersigned counsel respectfully requests a thirty-day extension 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, July 29, 2021.

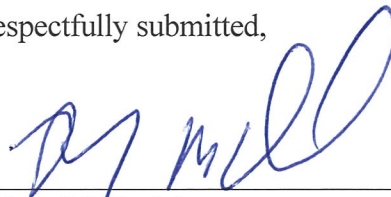
2. Counsel is preparing to file the seventeen volume (8,366 page) Record on Appeal tomorrow, July 30, 2021 in the death penalty case of The State v. Timothy Ray Jones, Jr. Counsel filed a Petition for Rehearing in the case of The State v. William C. (Billy) Sellers with

the Court of Appeals on July 22, 2021. Counsel filed the reply to return to petition for writ of certiorari to the Court of Appeals in the case of The State v. David Matthew Carter with this Court on July 2, 2021. Counsel filed the initial reply brief of appellant in the death penalty case of The State v. Timothy Ray Jones, Jr. with this Court on June 30, 2021 with co-counsel Susan Hackett, David Alexander, Lara Caudy, and Taylor Gilliam. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of The State v. David Matthew Carter with this Court on June 17, 2021. Counsel had an oral argument before the Court of Appeals on June 7, 2021 in The State v. Robert Xavier Geter. Counsel filed the initial reply brief of appellant in the case of The State v. Walter Murrey with the Court of Appeals on May 28, 2021. **Counsel also has extensive administrative duties as the Chief Appellate Defender.**

3. 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 thirty-day extension. 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,



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Robert M. Dudek  
Chief Appellate Defender

July 29, 2021