

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Anderson County
Letitia H. Verdin, Circuit Court Judge

RECEIVED

Aug 30 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 **final thirty-day extension, from August 30, 2021 until September 29, 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, August 30, 2021.
2. Counsel filed the initial reply brief of appellant in the case of The State v. Kierin Marcellus Dennis with the Court of Appeals on August 19, 2021 with co-counsel Adam Ruffin and Lara Caudy. 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 has extensive administrative duties as the Chief Appellate Defender, including administrative and Appellate Project oversight.**

3. Opposing counsel, the Attorney General's Office, has graciously consented to this extension request by way of the extended thirty-day general consent granted by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through August 31, 2021. That extended, emailed general consent was dated July 29, 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, from August 30, 2021 until September 29, 2021**, in which to file the petition for writ of certiorari and accompanying appendix. 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,



Robert M. Dudek
Chief Appellate Defender



J. Hugh Ryan, III
Executive Director/
Hervey B. O. Young
Deputy Director and General Counsel/
W. Lawrence Brown
Deputy General Counsel and Training
Director