

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Florence County

D. Craig Brown, Circuit Court Judge

RECEIVED

Sep 07 2021

S.C. SUPREME COURT

SHEMAINE M. ROBERSON,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2021-000433

MOTION FOR AN EXTENSION OF TIME
TO FILE THE PETITION FOR WRIT OF CERTIORARI
AND APPENDIX

Counsel for Shemaine M. Roberson respectfully requests a **final thirty (30) day extension, until October 7, 2021**, in which to file the Petition for Writ of Certiorari and Appendix in this case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. This is a third request for an extension. In support of this request, counsel shows:

1. The Petition for Writ of Certiorari and Appendix are due to be served and filed with the Court today. The Court has granted counsel two previous extensions.

2. Counsel for Shemaine M. Roberson respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions previously granted and the order in which counsel attempts to manage his caseload, counsel hopes that no further extension requests will be required.

3. Counsel filed the Petition for Writ of Certiorari to the Court of Appeals in The State v. Corey Jermaine Brown with the Supreme Court on August 30, 2021. Counsel filed the

brief of petitioner in Michael Duran Watson v. The State with the Court of Appeals on August 13, 2021. Counsel filed the brief of appellant and designation of matter in In the Matter of the Care and Treatment of James Ronnie Nichols, Jr with the Court of Appeals on August 11, 2021. Counsel filed the return to petition for writ of certiorari in The State v. M'Andre Cochran with the Supreme Court on August 2, 2021. Counsel filed the petition for rehearing in The State v. Corey Jermaine Brown with the Court of Appeals on July 21, 2021. Counsel, along with co-counsel filed the initial reply brief of appellant and designation of matter in the death penalty case of The State v. Timothy Ray Jones, Jr. with the Supreme Court on June 30, 2021. Counsel filed the initial brief of appellant and designation of matter in The State v. Joseph Randolph Henry with the Court of Appeals on June 17, 2021.

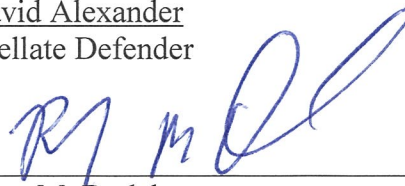
4. Counsel makes this request in good faith and not for purpose of delay.

5. On August 27, 2021, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through September 30, 2021.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until October 7, 2021**, in which to file the Petition for Writ of Certiorari and Appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for serving and filing the Petition for Writ of Certiorari and Appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,

s/David Alexander
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 7th day of September, 2021.