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Sep 15 2021

S.C. SUPREME COURT

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Richland County

Honorable Roger E. Henderson, Circuit Court Judge

WARREN WASHINGTON

PETITIONER,

V.

STATE OF SOUTH CAROLINA

RESPONDENT

APPELLATE CASE NO. 2021-000234

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

The undersigned counsel respectfully requests a third and **final thirty day extension, until October 15, 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.

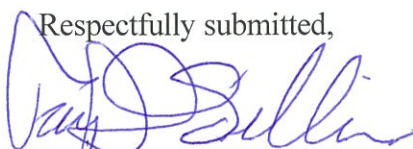
2. Counsel filed a Memorandum of Law on Behalf of Appellant in the case of The State v Shellie Davis with the Court of General Sessions in the 11th Judicial Circuit on September 10, 2021. Counsel filed the Reply Brief of Petitioner in the case of Mack Washington v. The State with the Court of Appeals on September 9, 2021. Counsel filed a Petition for the Writ of Certiorari to the Court of Appeals in the case of Michael Anthony Rogers v. The State

with the Supreme Court and the Court of Appeals on August 30, 2021. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Mark Anthony Hailey, Jr. with the Court of Appeals on August 23, 2021. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Levern McCrea v. The State with the Supreme Court on August 18, 2021. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of Calvin C. Cochran v. The State with the Court of Appeals on August 4, 2021.


3. Opposing counsel, the Attorney General's Office, has graciously consented to this extension request by way of the thirty-day reciprocal consent granted by email from Deputy Attorney General Donald J. Zelenka dated August 27, 2021 for all Appellate Defense extensions through September 30, 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 October 15, 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,


Taylor D. Gilliam
Appellate Defender



Robert M. Dudek
Chief Appellate Defender