

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

\_\_\_\_\_  
Appeal from Greenville County

R. Lawton McIntosh, Circuit Court Judge  
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**RECEIVED**

**Sep 22 2021**

S.C. SUPREME COURT

KENDALL DONYALE ARNOLD,

PETITIONER,

V.

THE STATE,

RESPONDENT.

APPELLATE CASE NO. 2021-000334  
\_\_\_\_\_

MOTION FOR AN EXTENSION OF TIME  
IN WHICH TO FILE THE PETITION FOR WRIT OF  
CERTIORARI AND APPENDIX  
\_\_\_\_\_

Counsel for Kendall Donyale Arnold respectfully requests a **final thirty (30) day extension, until October 22, 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, September 22, 2021. The Court has granted counsel two previous extensions.

2. Counsel for Kendall Donyale Arnold 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 her caseload, counsel hopes that no further extension requests will be required.

3. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Favian A. Hayes v. The State with this Court on September 15, 2021. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Alton Wesley Gore v. The State with this Court on September 1, 2021. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of The State v. Allen Charron Williams, Jr. with this Court on July 29, 2021. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Kendrick L. Mims v. The State with this Court on July 14, 2021.

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

5. 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 September 30, 2021. That extended, emailed general consent was dated August 27, 2021.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until October 22, 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 filing the Petition for Writ of Certiorari and Appendix be held in abeyance pending a ruling on this motion.

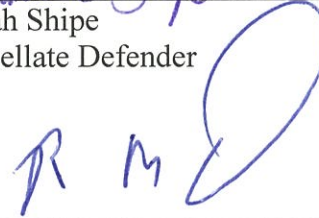
This 22nd day of September, 2021.

Respectfully submitted,



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Sarah Shipe  
Appellate Defender



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Robert M. Dudek  
Chief Appellate Defender