

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Darlington County

Honorable William H. Seals, Circuit Court Judge  
\_\_\_\_\_

**RECEIVED**

**Sep 29 2021**

S.C. SUPREME COURT

MARQUIVES BOATWRIGHT,

PETITIONER,

V.

STATE OF SOUTH CAROLINA

RESPONDENT

APPELLATE CASE NO. 2021-000565  
\_\_\_\_\_

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

Counsel for Gerald Marquives Boatwright respectfully requests an extension of thirty (30) days 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 second 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.
2. Counsel for Marquives Boatwright 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 is currently attending the South Carolina Public Defender Association Annual Conference. Counsel filed a Memorandum of Law on Behalf of Appellant in the case of The

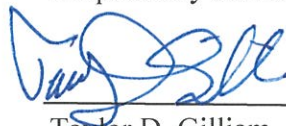
State v Shellie Davis with the Court of General Sessions in the 11<sup>th</sup> Judicial Circuit on September 10, 2021. Counsel filed the Reply Brief of Petitioner in the case of Mack Washington v. The State with the Court of Appeals on September 9, 2021. Counsel filed a Petition for the Writ of Certiorari 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.

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

5. Counsel for the Attorney General's office has consented to this request by way of a thirty-day reciprocal consent granted by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through September 30, 2021. That emailed consent was generated on August 27, 2021.

WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension, 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 be held in abeyance pending a ruling on this motion.

Respectfully submitted,



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Taylor D. Gilliam  
Appellate Defender

September 29, 2021