

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Calhoun County

Maite Murphy, Circuit Court Judge

RECEIVED

Nov 18 2021

S.C. SUPREME COURT

EDWARD BRITT, JR.,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2021-000845

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

Counsel for Edward Britt respectfully requests an extension of thirty (30) days in which to serve and 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 Edward Britt 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 filing a petition for rehearing in the case of Allen Stone v. The State with the Court of Appeals today, November 18, 2021. Counsel filed the brief of appellant and record on appeal in the case of The State v. Joshua Rothwell with the Court of Appeals on November 8, 2021. Counsel filed the petition for writ of certiorari in Jason Ervin Black v. The State with the Supreme Court on November 3, 2021. Counsel filed the brief of appellant and record on appeal in the case of The State v. Lamont Antonio Samuel with the Court of Appeals on October 27, 2021. Counsel filed the petition for writ of certiorari and accompanying appendix in Darius Ransom-Williams v. The State with the Supreme Court on October 15, 2021. Counsel filed the petition for writ of certiorari and accompanying appendix in Shemaine M. Roberson v. The State with the Supreme Court on October 7, 2021. Counsel filed the initial brief of appellant and designation of matter in The State v. Kevin J. McKinnon with the Court of Appeals on September 27, 2021. On September 21, 2021, counsel had an oral argument in The State v. Mary Ann German before the Supreme Court. On September 15, 2021, counsel had an oral argument in The State v. Montrelle Lamont Campbell before the Court of Appeals.

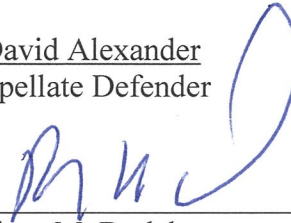
4. Counsel makes this request in good faith and not for purpose of delay.

5. On October 28, 2021, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through November 30, 2021.

WHEREFORE, the undersigned counsel would respectfully request a thirty (30) day extension, in which to serve and 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 18th day of November, 2021.