

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Jan 19 2022

S.C. SUPREME COURT

Certiorari to Sumter County

Honorable R. Kirk Griffin, Circuit Court Judge

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MICHAEL ROSE,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2021-000484

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

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Counsel for Michael Charles Rose respectfully requests a **final thirty (30) day extension, until February 18, 2022**, 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 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.
2. Counsel for Michael Charles Rose 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.

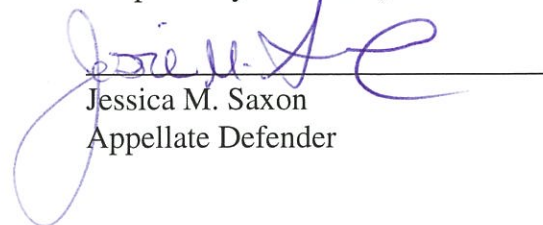
3. Counsel filed the Reply Brief of Petitioner in the case of George N. Moses v. The State with the Court of Appeals on December 29, 2021. Counsel filed a Motion to Hold in Abeyance in the case of Terry McCall v. The State with the South Carolina Supreme Court on December 21, 2021. Counsel filed a Reply to Respondent's Return to Appellant's Motion to Strike and Motion to Amend Designation of Matter in the case of The State v. James Winston Almond with the Court of Appeals on December 7, 2021.

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

5. On December 29, 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 January 31, 2022.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until February 18, 2022**, 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 filing the Petition for Writ of Certiorari and Appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Jessica M. Saxon  
Appellate Defender



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Robert M. Dudek  
Chief Appellate Defender

This 19th day of January, 2022.