

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Lexington County  
Honorable Courtney Clyburn-Pope, Circuit Court Judge

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RAPHAEL L. PONTOO,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2021-001217

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

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Counsel for petitioner 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 petitioner 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.

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S.C. SUPREME COURT

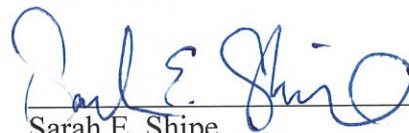
3. Counsel filed the initial brief of appellant in the State v. Levy Brown with the Court of Appeals on February 7, 2022. Counsel filed the reply to return to petition for writ of certiorari to the Court of Appeals in the case of State v. Carmie Josette Nelson with this Court on January 18, 2022. Counsel filed the initial brief of appellant in the State v. Anthony T. McKennie with the Court of Appeals on January 18, 2022. Counsel filed the initial brief of appellant in the State v. Jermaine Silas White with the Court of Appeals on January 7, 2022. Counsel filed the petition for rehearing in the case of State v. Jeffery James Williams with the Court of Appeals on December 22, 2021.

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

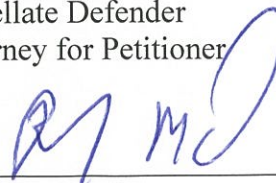
5. Opposing counsel, the Attorney General's Office, has graciously consented to this extension request by way of the thirty day general consent granted by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through February 28, 2022. That emailed general consent was dated January 31, 2022.

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,



Sarah E. Shipe  
Appellate Defender  
Attorney for Petitioner



Robert M. Dudek  
Chief Appellate Defender

This 9<sup>th</sup> day of February, 2022