

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Horry County

William H. Seals, Circuit Court Judge

RECEIVED

Feb 28 2022

S.C. SUPREME COURT

PANTELEIMON SPIRAKIS,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2021-000887

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

Counsel for Panteleimon Spirakis respectfully requests a **final thirty (30) day extension, until March 30, 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 Panteleimon Spirakis 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 filed the Brief of Petitioner in The State v. Corey Jermaine Brown with the Supreme Court on February 24, 2022. Counsel filed the Return to Petition for Writ of Certiorari in Jason Ervin Black v. The State with the Supreme Court on February 23, 2022. Counsel had an oral argument in The State v. Derrick Lamar Porter before the Court of Appeals on February 15, 2022. Counsel had an oral argument in The State v. Sylvester Ferguson III before the Court of Appeals on February 10, 2022. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of In the Matter of the Care and Treatment of John Shelby Wells with the Court of Appeals on February 9, 2022. Counsel filed a petition for writ of certiorari to the Court of Appeals in Allen Stone v. The State with the Supreme Court on January 28, 2022. Counsel filed the petition for writ of certiorari and accompanying appendix in Edward Britt, Jr. v. The State with the Supreme Court on January 19, 2022. Counsel filed the initial brief of appellant and designation of matter in The State v. Jermaine Demarcus Grier with the Court of Appeals on January 18, 2022. Counsel filed the brief of appellant and record on appeal in the case of The State v. Lavar Anthony Smith with the Court of Appeals on January 4, 2022.

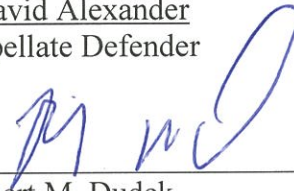
4. Counsel makes this request in good faith and not for purpose of delay.

5. On January 31, 2022, 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 February 28, 2022.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until March 30, 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,

s/David Alexander
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 28th day of February, 2022.