

Jun 15 2022

S.C. SUPREME COURT

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Spartanburg County

Honorable William A. McKinnon, Circuit Court Judge

MARK ALLEN BRADBERRY,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2021-001449

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

Counsel for petitioner respectfully requests a **final thirty (30) day extension, until July 15, 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 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.

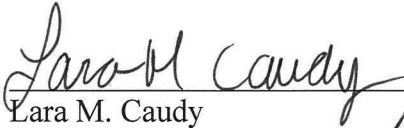
3. On June 13, 2022, counsel filed the petition for writ of certiorari and accompanying appendix in the case of Herman Hughes v. State with the Supreme Court. On June 13, 2022, counsel filed the petition for writ of certiorari pursuant to Austin v. State in the case of Herman Hughes v. State with the Supreme Court. On June 6, 2022, counsel filed the return to the petition for writ of certiorari in The State v. Montrelle Lamont Campbell with the Supreme Court. On June 1, 2022, counsel filed the brief of appellant and designation of matter in The State v. James Rickey Morris with the Court of Appeals. On May 20, 2022, counsel filed the brief of appellant and designation of matter in The State v. Christopher Hallbrook with the Court of Appeals. On May 12, 2022, counsel had an oral argument in The State v. Rakeem White before the Court of Appeals. On May 6, 2022, counsel filed the brief of appellant and designation of matter in The State v. Devonte Major with the Court of Appeals. On April 28, 2022, counsel attended a reconstruction hearing in the case of Artrell Hickson v. The State before the circuit court. On April 25, 2022, counsel filed the brief of appellant and designation of matter in The State v. David Hill, Jr. with the Court of Appeals.

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

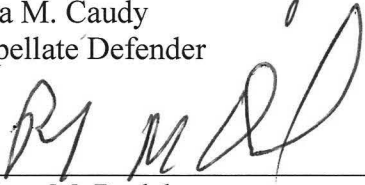
5. On May 31, 2022, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through June 30, 2022.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until July 15, 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,



Lara M. Caudy
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 15th day of June, 2022.