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Jul 11 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

Appeal from Greenville County  
The Honorable G.D. Morgan

Appellate Case No. 2022-000374

The State of South Carolina . . . . . Respondent

v.

Kathryn Martin Key . . . . . Petitioner

**THIRD MOTION FOR EXTENSION**

Undersigned counsel respectfully requests a one month extension to file the initial brief and designation of matter in this case. The brief is currently due July 13, 2022. Counsel has over the past thirty days served and filed responsive pleadings in McDowell v. McDowell (2022-DR-39-275), Order in Arnold v. Edens (2022-DR-23-1858), and resolved a complicated CSC 1st Degree case State v. McKinney (2022GS2303867A). Counsel has had numerous on-going client related matters that have required extensive and immediate attention over the past thirty days. The undersigned certifies that the time devoted to other cases has been necessary to meet client demands and balance the obligations of counsel to perform case related tasks in the most reasonable manner that will benefit all clients without harming any one client. Furthermore, Counsel's eighteen month old daughter has to go to the hospital on July 13th for a medical procedure and testing related to an autoimmune condition that requires general anesthesia. The health of counsel's daughter, which includes the coordination and scheduling of this procedure, has been very time consuming. The undersigned submits that this extension is warranted and that good cause exists for an extension of time in the case.

Counsel respectfully requests a due date of August 13, 2022. Counsel does not anticipate the need for an additional extension.

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**CERTIFICATE OF SERVICE**

Counsel hereby certifies she has served William M. Blicht, Jr. and Alan McCrory Wilson of the SC Attorney General's Office as well as Mitchell K. Byrd, Sr. and Elizabeth Gary of the 13th Circuit Solicitor's Office with a copy of this motion on this date, July 11, 2022.

/s/ E. Powers Price