

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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Certiorari to Florence County

Honorable George M. McFaddin, Circuit Court Judge

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RONNIE M. DRAKE,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2022-000125

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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 Ronnie Mickell Drake respectfully requests a **final thirty (30) day extension, until August 26, 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 Ronnie Mickell Drake respectfully submits that extraordinary

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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 Petition for Writ of Certiorari and Appendix in the case of Reginald A. Dudley v. The State with this Court on July 18, 2022. Counsel filed the Anders Brief of Appellant and Record on Appeal in the case of The State v. DaJuan Young with the Court of Appeals on July 6, 2022. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Corey Brown v. The State with this Court on July 5, 2022. Counsel filed the Anders Brief of Appellant and Record on Appeal in the case of Vincente Pineda Garcia v. The State with the Court of Appeals on June 30, 2022. Counsel filed the Petition for Writ of Certiorari, the Petition for Writ of Certiorari Pursuant to Austin v. State, and the Appendix in the case of Aryee Henderson v. The State with this Court on June 29, 2022. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Holly Jo Thompson v. The State with this Court on June 13, 2022. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Worth Edward Cook, III v. The State with the Court of Appeals on June 7, 2022.

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

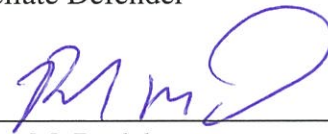
5. On June 30, 2022, opposing counsel, the Office of the Attorney General, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through July 31, 2022.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension until August 26, 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/ Jessica M. Saxon  
Jessica M. Saxon  
Appellate Defender



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Robert M. Dudek  
Chief Appellate Defender

This 27th day of July, 2022.