

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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Certiorari to Kershaw County

Honorable Diane Schafer Goodstein, Circuit Court Judge

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JAMACIA SIMON,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2022-000086

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

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Counsel for Jamacia Simon respectfully requests an extension of thirty (30) days 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 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 Jamacia Simon respectfully submits that extraordinary circumstances

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**Jul 27 2022**

S.C. SUPREME COURT

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 Petition for Certiorari to the Court of Appeals in the case of Jordan Marie Hodge v. The State with this Court on July 25, 2022. Counsel filed the Return to Petition to Writ of Certiorari in the case of The State v. Phillip Wayne Lowery with this Court on July 11, 2022. Counsel filed the Brief of Petitioner in the case of Andre Green v. The State with the Court of Appeals on July 1, 2022. Counsel filed the Return to the State's Motion to Dismiss and Motion to Vacate the Published Opinion in the case of In the Interest of Christopher H., A Juvenile with this Court on June 7, 2022. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Amy Berridge v. The State with this Court on June 3, 2022. Counsel filed the Petition for Rehearing in the case of Jordan Marie Hodge v. The State with the Court of Appeals on May 26, 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 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 serving and filing the Petition for Writ of Certiorari and Appendix be held in abeyance

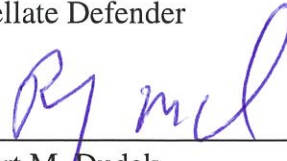
pending a ruling on this motion.

Respectfully submitted,



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Taylor D Gilliam  
Appellate Defender



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Robert M. Dudek  
Chief Appellate Defender

This 27th day of July, 2022.