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Aug 26 2022

S.C. SUPREME COURT

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 TO SERVE AND FILE  
THE PETITION FOR WRIT OF CERTIORARI  
AND APPENDIX

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Counsel for Jamacia Simon respectfully requests a **final thirty (30) day extension, from August 26, 2022 until September 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 Jamacia Simon 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.

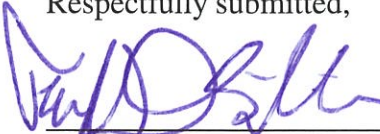
3. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of Randy Marchbanks v. The State with the Court of Appeals on August 25, 2022. Counsel was in attendance at the 2022 American Bar Association Annual Meeting in Chicago, Illinois as one of the representatives of the South Carolina Bar Young Lawyers Division from August 4, 2022 through August 7, 2022. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Justin Bradley v. The State with this Court on August 3, 2022. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of William Coleman v. The State with this Court on August 1, 2022. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of David Crockett Robinson v. The State with the Court of Appeals on July 27, 2022. Counsel filed the Petition for Certiorari to the Court of Appeals in the case of Jordan Marie Hodge v. The State with this Court and the Court of Appeals on July 25, 2022. Counsel filed the Return to Petition to Writ of Certiorari in the case of The State v. Phillip Wayne Lowery on July 11, 2022 with this Court. Counsel filed the Brief of Petitioner in the case of Andre Green v. The State with the Court of Appeals on July 1, 2022.

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

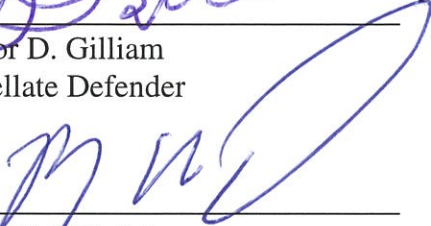
5. On July 27, 2022, opposing counsel, the Office of the Attorney General, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through August 31, 2022.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension from August 26, 2022 until September 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,



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Taylor D. Gilliam  
Appellate Defender



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Robert M. Dudek  
Chief Appellate Defender

This 26th day of August, 2022.