

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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Certiorari to Lee County

Honorable Diane Schafer Goodstein, Circuit Court Judge

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JOHNNY HAGGINS,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2022-000176

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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 Johnny Haggins respectfully requests an extension of thirty (30) days from August 31, 2022 until September 30, 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 Johnny Haggins respectfully submits that extraordinary circumstances

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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 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 Maurice L. Robinson v. the State with this Court on August 29, 2022. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Odom Bryant v. The State with this Court on August 22, 2022. Counsel filed the Petition for Rehearing in the case of Justin Ryan Cone v. The State with the Court of Appeals on August 16, 2022. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Ronnie M. Drake v. The State with this Court on August 3, 2022. 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.

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

5. On July 27, 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 August 31, 2022.

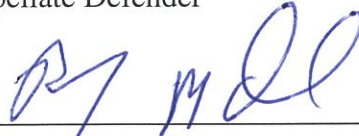
WHEREFORE, the undersigned counsel would respectfully request a thirty (30) day extension from August 31, 2022 until September 30, 2022, in which to serve and file the Petition for Writ of Certiorari and Appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for serving and filing the Petition for Writ of Certiorari and Appendix be held in abeyance pending a ruling on this motion.

[signature page to follow]

Respectfully submitted,

s/ Jessica M. Saxon

Jessica M. Saxon  
Appellate Defender



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Robert M. Dudek  
Chief Appellate Defender

This 31st day of August, 2022.