

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Spartanburg County

Honorable William A. McKinnon, Circuit Court Judge

MARK ALLEN BRADBERRY,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

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SEP 29 2022

S.C. SUPREME COURT

APPELLATE CASE NO. 2021-001449

MOTION FOR TIME EXTENSION (2nd)
SHOWING GOOD CAUSE

Petitioner, Mark Allen Bradberry, comes before this court with his 2nd Motion for Time Extension with showing of good cause as directed by the court when Petitioner's first motion for time extension was granted. In support of this motion Petitioner submits the following facts as showing of good cause:

1) Petitioner is untrained in the law, having very little education, and even though he has been working with all diligence is not yet ready to file his pro-se response.

2) Due to covid restrictions on movement and several weeks without access to Westlaw, due to it not working, Petitioner has suffered a large set back in his research and preparation of his pro-se response.

3) The Petitioner is actually innocent and is in need of documents he has not received from his prior counsel. Petitioner is mailing out the request for the needed documents this week. So he will need time

to receive and prepare those documents to be filed with his pro se response.

CONCLUSION

WHEREFORE, considering the above mentioned good cause, the Petitioner moves this court to grant him a 90 day extension of time to serve and file his pro-se response. Or, however much time this Court deems fit.

This 25th day of September, 2022.

Respectfully Submitted,
Mark Allen Broadberry
Mark Allen Broadberry
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