

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

RECEIVED
Sep 29 2022
S.C. SUPREME COURT

Certiorari to Lee County

Honorable Diane Schafer Goodstein, Circuit Court Judge

JOHNNY HAGGINS,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2022-000176

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

Counsel for Johnny Haggins respectfully requests a **final thirty (30) day extension, from September 30, 2022 until October 31, 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 tomorrow.
2. Counsel for Johnny Haggins 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 her caseload, counsel hopes that no further extension requests will be required.

3. Counsel filed the Petition for Writ of Certiorari Pursuant to *Mack v. State* and the Appendix in the case of John Willie Mack, Sr. v. The State with the Court of Appeals on September 26, 2022. Counsel filed the Petition for Rehearing in the case of Amy N. Taylor v. The State with the Court of Appeals on September 1, 2022. 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.

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

5. On September 28, 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 October 31, 2022.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension from September 30, 2022 until October 31, 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,



Jessica M. Saxon
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 29th day of September, 2022.