

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.

APPELLATE CASE NO. 2021-001449

Motion For Time Extension To Serve And File
Pro-se Response To Johnson Petition Showing
Good Cause

The petitioner, Mark ALLEN BRADBERRY, comes before this court requesting a time extension to serve and file his pro-se response to the "Johnson" petition in the above captioned case. The petitioner presents the following fact and exhibits as a showing of good cause:

1.

On 09/26/2022, the petitioner wrote his trial attorney Robert B. Hall requesting petitioner's Complete Defense case file. (see petitioner's exhibit A; copy of request letter). Mr. Hall, as of date, has failed to respond. Petitioner can not complete his pro-se response with out these requested documents.

2.
On 10/09/2022, the petitioner wrote his PCR attorney Susannah Ross, requesting petitioner's "Client's case file". (see petitioner's exhibit B; Copy of request letter.) Ms. Ross, as of date, has failed to respond. Petitioner can not complete his pro-se response with out these requested documents.

3.
Petitioner is uneducated in matters of law and has mental health issues. Petitioner is working as hard as he can to prepair his pro-se response, but still requires more time to research, investigate, and present his claims.

Conclusion

WHEREFORE, considering the above showing of good cause petitioner request 30-90 days time extension to serve and file his pro-se response.

This the 24th day of October, 2022

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OCT 27 2022

S.C. SUPREME COURT

Respectfully Submitted,
Mark Allen Bradberry

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