

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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Certiorari to Florence County  
Honorable Donald B. Hocker, Trial Judge  
Honorable George M. McFaddin, PCR Judge

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RECEIVED

Nov 14 2022

S.C. SUPREME COURT

TAMARQUIS WINGATE,  
PETITIONER,

v.

STATE OF SOUTH CAROLINA,  
RESPONDENT.

APPELLATE CASE NO. 2021-001329

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MOTION FOR EXTENSION TO SERVE AND FILE  
RETURN TO MOTION FOR BAIL

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Counsel for Respondent respectfully requests a five-day extension to serve and file the Return to Applicant's motion for bail in the above-referenced case. In support of this motion, Counsel respectfully submits:

1. The Return to Applicant's motion for bail is due to be served and filed on Monday, November 14, 2022.
2. Respondent opposes the motion for bail and is requesting an extension to serve and file a return.
3. Counsel for Respondent has a PCR term of Court in the 5<sup>th</sup> Circuit for the week of November 14-18, 2022. During this term Counsel will be handling four PCR matters involving

Marie Assa'ad Faltas. Counsel has spent a substantial amount of time preparing for these hearings. As a result of these hearings, Counsel has not had adequate time to prepare a response to Applicant's Motion for Bail.

4. This motion is made in good faith and not for the purposes of delay.

WHEREFORE Counsel respectfully requests a five-day extension to serve and file return opposing Applicant's motion for bail. Counsel further respectfully requests the time limits for serving and filing the return be held in abeyance pending a ruling on this motion.

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