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Dec 28 2022

S.C. SUPREME COURT

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Spartanburg County

Honorable G.D. Morgan, Jr., Circuit Court Judge

JOHNNY CHAPMAN,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2022-001029

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

Counsel for Johnny Ray Chapman respectfully requests an extension of thirty (30) days from December 28, 2022 until January 30, 2023 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 Ray Chapman 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.

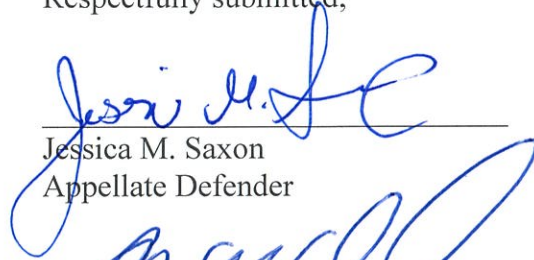
3. Counsel filed the Petition for Certiorari to the Court of Appeals and the Appendix in the case of The State v. Amy N. Taylor with the Supreme Court on December 6, 2022. Counsel filed the Petition for Writ of Certiorari and the Appendix in the case of Toaby Alexander Trapp v. The State with the Supreme Court on November 18, 2022. Counsel filed the Final Brief of Appellant and Record on Appeal in the case of Michael A. Williams v. The State with this Court on November 9, 2022. Counsel filed the Petition for Rehearing in the case of Michael Edward Williams v. The State with this Court on November 8, 2022. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Terbias Jerrod Goff with this Court on November 7, 2022.

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

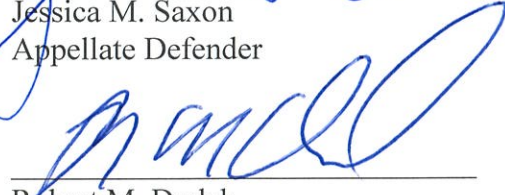
5. On November 29, 2022, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through December 31, 2022.

WHEREFORE, the undersigned counsel would respectfully request a thirty (30) day extension from December 28, 2022 until January 30, 2023, 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.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Jessica M. Saxon", written over a horizontal line.

Jessica M. Saxon
Appellate Defender

A handwritten signature in blue ink, appearing to read "Robert M. Dudek", written over a horizontal line.

Robert M. Dudek
Chief Appellate Defender

This 28th day of December, 2022.