

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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Certiorari to Abbeville County

Mark J. Hayes, Circuit Court Judge

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**RECEIVED**

**Feb 08 2023**

S.C. SUPREME COURT

GREER HAYNIE ASHLEY,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2022-001222

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

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Counsel for Petitioner respectfully requests an extension of thirty (30) days 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 Petitioner 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.

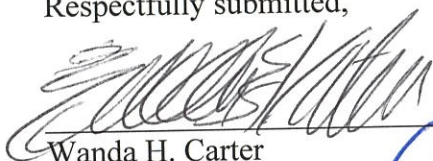
3. Counsel filed the Johnson petition for writ of certiorari in the case of Cecil Eugene Blackwell v. State with the Supreme Court on February 3, 2023. Counsel filed the petition for writ of certiorari in the case of Andrew Ryan Murphy v. State with the Supreme Court on January 27, 2023. Counsel filed the Johnson petition for writ of certiorari in the case of John D. Lane v. State with the Supreme Court on January 18, 2023. Counsel filed the Johnson petition for writ of certiorari in the case of Christopher Wilbert Keitt v. State with the Supreme Court on December 16, 2022. Counsel filed Counsel filed the Anders brief of appellant In The interest of Jah'ki B., a Juvenile Under the Age of Seventeen, with the Court of Appeals on December 12, 2022. Counsel filed the Johnson petition for writ of certiorari in the case of Jared Scott Childress v. State with the Supreme Court on December 7, 2022. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of State v. Derrick Miles with the Supreme Court on December 2, 2022. Counsel filed the Anders brief of appellant in the case of State v. Vicki L. Rodriguez with the Court of Appeals on November 10, 2022. Counsel filed the initial brief of appellant in the case of State v. Michael I. Mobley with the Court of Appeals on November 7, 2022.

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

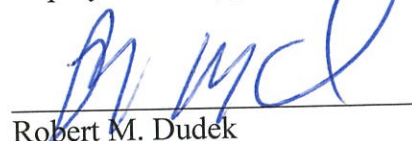
5. On February 1, 2023, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through February 28, 2023.

WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension, 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,



Wanda H. Carter  
Deputy Chief Appellate Defender



Robert M. Dudek  
Chief Appellate Defender

This 8th day of February, 2023.