

STATE OF SOUTH CAROLINA
In the Supreme Court

RECEIVED

Mar 01 2023

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

S.C. SUPREME COURT

Edward W. Miller, Circuit Court Judge

Appellate Case No. 2019-001605
Unpublished Opinion No. 2022-UP-213

Lucas Marchant,.....Respondent,

v.

John Doe and John Doe d/b/a as Democrats for Marchant,
of which John Doe is the..... Petitioner.

MOTION TO EXTEND TIME TO FILE
RETURN TO PETITION FOR WRIT OF CERTIORARI

Petitioner has filed a petition for a writ of certiorari in this Court. Respondent has calculated today as the due date and expected to file a return to today. However, for the following reasons, counsel requests a 10-day extension to file this return.

Counsel has two pressing matters that have prevented him from completing the return by today. He is lead counsel on a remanded case from this Court (*Owens v. Stirling*) which involves a very short timeline in the Circuit Court. A discovery conference in that case has been scheduled for today. Due to the nature of the communications with opposing counsel, counsel spent a significant amount of time preparing for this conference.

Additionally, counsel is defending a federal case involving a significant conspiracy to traffic in weapons and has less than a week to review all discovery to prepare for a potential meeting with out of state federal agents next week.

For these two reasons, counsel is unable to complete this return by today's deadline and respectfully requests this Court allow a 10-day extension and set a new deadline of Friday, March 10 to complete the return.

Counsel believes this short delay will not prejudice either party or interfere with the Court's efficient resolution of this matter. For these reasons, counsel respectfully requests an extension to March 10. Counsel has consulted with the opposing party and there is no objection to this extension.

Respectfully submitted,

s/ Joshua Snow Kendrick

Joshua Snow Kendrick (SC Bar 70453)

Christopher S. Leonard (SC Bar 80166)

KENDRICK & LEONARD, P.C.

506 Pettigru Street (29601)

P.O. Box 6938

Greenville, SC 29606

(864) 760-4000

Josh@KendrickLeonard.com

Greenville, South Carolina
March 1, 2023