

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Mar 08 2023

S.C. SUPREME COURT

Certiorari to Spartanburg County  
Honorable Daniel D. Hall, Circuit Court Judge

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BOBBY GOODE,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2022-001484

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

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Counsel for Bobby Goode respectfully requests a **final thirty (30) day extension, until April 7, 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 third 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 Bobby Goode 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 initial brief of appellant and designation of matter in the case of The State v. Andre Covington with the Court of Appeals on February 23, 2023. Counsel filed the petition for rehearing in the case of The State v. Jason Edwin Stoots with the Court of Appeals on February 22, 2023. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Ashley Prior v. The State with the Supreme Court on February 9, 2023. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Shannon Bone with the Court of Appeals on February 7, 2023. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of Adonis Williams v. The State with the Supreme Court on February 3, 2023. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Robert Bailey with the Court of Appeals on January 18, 2023. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of The State v. Jonathan Duncan with the Supreme Court on December 9, 2022. Counsel filed the brief of appellant and designation of matter in the case of The State v. Jeffery Truesdale with the Court of Appeals on December 8, 2022. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Austin McQuarters v. The State with the Supreme Court on December 5, 2022.

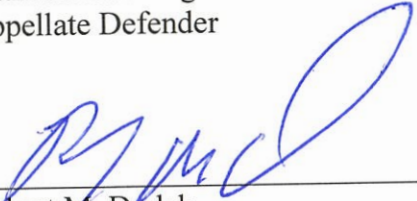
4. Counsel makes this request in good faith and not for purpose of delay.

5. Opposing counsel, the Attorney General's Office, has graciously consented to this extension request by way of the thirty-day general consent granted by email from Deputy Attorney General Donald J. Zelenka dated February 28, 2023 for all Appellate Defense extensions through March 31, 2023.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until April 7, 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 filing the petition for writ of certiorari and appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,

  
Kathrine H. Hudgins  
Appellate Defender

  
Robert M. Dudek  
Chief Appellate Defender

This 8<sup>th</sup> day of March, 2023.