

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Cherokee County

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

RECEIVED

Mar 15 2023

S.C. SUPREME COURT

EDDIE MOTTS,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2022-001264

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

Counsel for Eddie Motts 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 Eddie Motts 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. On March 10, 2023, counsel filed the brief of appellant and designation of matter in The State v. Joshua Manning with the Court of Appeals. On February 21, 2023, counsel filed the petition for writ of certiorari to the Court of Appeals in The State v. Nyquan Brown with the Supreme Court. On February 17, 2023, counsel filed the petition for writ of certiorari and accompanying appendix in Aaron Van Hendrix v. The State with the Supreme Court. On February 13, 2023, counsel filed the petition for writ of certiorari and accompanying appendix in Timothy James Wright v. The State with the Supreme Court. On February 6, 2023, counsel filed the petition for writ of certiorari and accompanying appendix in Regina Owings v. The State with the Supreme Court. On January 31, 2023, counsel filed the initial brief of appellant and designation of matter in The State v. Barry Wayne Jones with the Court of Appeals. On January 13, 2023, counsel filed the petition for writ of certiorari and accompanying appendix in Lance Leon Miles v. The State with the Supreme Court.

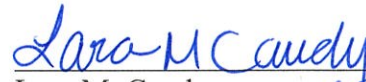
4. Counsel makes this request in good faith and not for purpose of delay.

5. On February 28, 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 March 31, 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,



Lara M. Caudy
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 13th day of March, 2023.