

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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Certiorari to Anderson County

William P. Keesley, Circuit Court Judge

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KYNDRA L. HOWELL,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2022-001229

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**PETITION FOR EXTENSION OF TIME TO FILE  
PETITION FOR WRIT OF CERTIORARI  
AND APPENDIX**

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The undersigned counsel respectfully requests a thirty-day extension in which to file the petition for writ of certiorari and appendix in the above-referenced case. In support of this motion, counsel respectfully shows the Court the following exigent circumstances:

1. The petition for writ of certiorari and appendix in this case are due to be served and filed today, having been extended by one prior order of this Court.

2. Counsel filed the initial reply brief of appellant in the case of State v. Michael Barclay in the Court of Appeals on March 13, 2023. Counsel filed the brief of respondent in the case of Rodney C. Bryan v. State in the Supreme Court on March 10, 2023. Counsel filed the initial brief of appellant and record on appeal in the case of State v. Tyrell Vanquiz Harrison in the

Court of Appeals on March 8, 2023. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of State v. Xzariera Okevis Gray in the Supreme Court on March 6, 2022. Counsel filed the return to petition for writ of certiorari to the Court of Appeals in the case of State v. Devin Jamel Johnson in the Supreme Court on March 1, 2023. On February 17, 2023, counsel participated as a presenter on the topic of Error Preservation for a CLE entitled Back to Basics sponsored by the South Carolina Association of Criminal Defense Lawyers. Counsel attended a PCR Hearing as a witness in the case of Christopher Moore v. State in Lancaster on February 16, 2023. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Matthew Young in the Court of Appeals on February 16, 2023. Counsel filed the brief of petitioner in the case of Rodney C. Bryan v. State in the Supreme Court on February 10, 2023. Counsel had an oral argument in the case of State v. Travis Latrell Lawrence in the Supreme Court in Conway on February 8, 2023. Counsel filed the return to petition for rehearing in the case of State v. Kenneth Lamont Robinson, Jr. in the Court of Appeals on January 30, 2023. Counsel filed the brief of respondent in the case of Carnie Norris v. State in the Court of Appeals on January 27, 2023. Counsel filed the reply to return to petition for writ of certiorari to the Court of Appeals in the case of State v. Nicholas Benjamin Chhith-Berry in the Supreme Court on January 19, 2023. Counsel filed the reply brief of petitioner in the case of State v. Robert Lee Miller, III in the Supreme Court on January 19, 2023. Counsel filed the reply to return to petition for writ of certiorari to the Court of Appeals in the case of State v. Joseph Lamar Brown, Jr. in the Supreme Court on January 17, 2023.

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

4. 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.

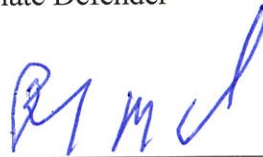
WHEREFORE, the undersigned counsel respectfully requests a thirty-day extension in which to file the petition for writ of certiorari and appendix in this case. Counsel requests that the time limits for filing the petition for writ of certiorari be held in abeyance pending a ruling on this motion.

Respectfully submitted,



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Susan B. Hackett  
Appellate Defender



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Robert M. Dudek  
Chief Appellate Defender

March 15, 2023