

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Anderson County

William P. Keesley, Circuit Court Judge

RECEIVED

May 08 2023

S.C. SUPREME COURT

MARY NIMMONS PATRICK,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2022-001253

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

Counsel for petitioner respectfully requests a **final thirty day extension, until June 7, 2023**, in which to 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. The Court has granted counsel two previous extensions.
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 requests for extension are required.

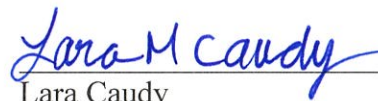
3. On May 4, 2023, counsel filed the petition for writ of certiorari and accompanying appendix in Eddie Motts v. The State with the Supreme Court. On April 28, 2023, counsel, along with co-counsel, filed the reply brief of petitioner in Marion Alexander Lindsey v. The State with the Supreme Court. On April 28, 2023, counsel filed the petition for writ of certiorari and accompanying appendix in Kyndra Howell v. The State with the Supreme Court. On April 25, 2023, counsel filed the initial reply brief of appellant in The State v. Bowen Gray Turner with the Court of Appeals. On April 19, 2023, counsel filed the initial brief of appellant and designation of matter in The State v. George Holmes with the Court of Appeals. On April 14, 2023, counsel, along with co-counsel, filed the petition for rehearing in The State v. Timothy Ray Jones, Jr. with the Supreme Court. On April 4, 2023, counsel filed the petition for rehearing in Matthew Dwyer v. The State with the Court of Appeals.

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

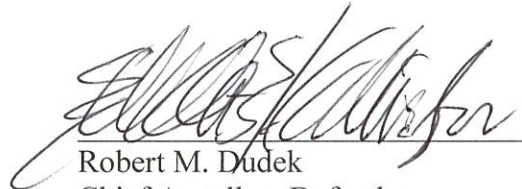
5. On April 28, 2023, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through May 31, 2023.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty day extension, until June 7, 2023**, in which to 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,



Lara Caudy
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 8th day of May, 2023.