

**RECEIVED**

**May 31 2023**

S.C. SUPREME COURT

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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Certiorari to Marion County

Honorable William H. Seals, Circuit Court Judge

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RICHARD A. WOODBURY,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2023-000121

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

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Counsel for Richard Allen Woodbury respectfully requests an extension of thirty (30) days from May 31, 2023 until June 30, 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 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 Richard Allen Woodbury 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.

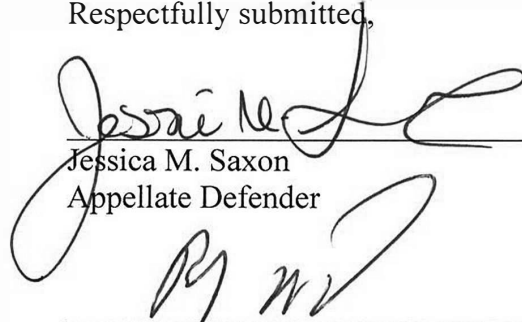
3. Counsel filed the Anders Brief of Appellant in the case of The State v. Devajay R. Stevens with the Court of Appeals on May 19, 2023. Counsel filed the Petition for Rehearing in the case of The State v. Gary M. Wirtz with the Court of Appeals on May 18, 2023. Counsel filed the Johnson Petition for Writ of Certiorari in the case of William S. Vanderford v. The State with this Court on May 12, 2023. Counsel filed the Petition for Writ of Certiorari in the case of Richard Andrew Hagins v. The State with this Court on May 1, 2023. Counsel filed the Johnson Petition for Writ of Certiorari in the case of Tron Haney v. The State with this Court on April 28, 2023. Counsel filed the Petition for Rehearing in the case of The State v. Calvin D. Ford with the Court of Appeals on April 24, 2023.

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

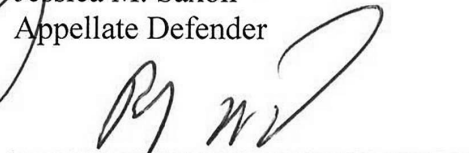
5. On April 28, 2023, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through May 31, 2023.

WHEREFORE, the undersigned counsel would respectfully request a thirty (30) day extension from May 31, 2023, until June 30, 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 serving and filing the Petition for Writ of Certiorari and Appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jessica M. Saxon", written over a horizontal line.

Jessica M. Saxon  
Appellate Defender

A handwritten signature in black ink, appearing to read "Robert M. Dudek", written over a horizontal line.

Robert M. Dudek  
Chief Appellate Defender

This 31st day of May, 2023.