

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Marion County

Honorable William H. Seals, Circuit Court Judge

RICHARD A. WOODBURY,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2023-000121

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

Counsel for Richard Allen Woodbury respectfully requests a **final thirty (30) day extension, from June 30, 2023, until July 31, 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 Richard Allen Woodbury respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the

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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.

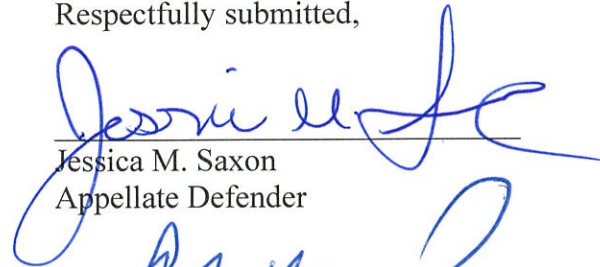
3. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. James B. Curry with the Court of Appeals on June 29, 2023. Counsel filed the Brief of Petitioner in the case of Justin Ryan Cone v. The State with this Court on June 23, 2023. Counsel filed the Petition for Writ of Certiorari to the Court of Appeals and Appendix in the case of The State v. Calvin D. Ford with this Court on June 19, 2023. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Geordi Jerell Heyward v. The State with this Court on June 14, 2023. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Stephon Robinson v. The State with this Court on June 12, 2023. Counsel filed the Johnson Petition for Writ of Certiorari in the case of Jason R. Jones v. The State with this Court on June 7, 2023.

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

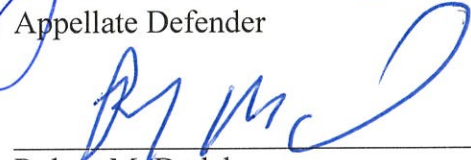
5. On May 31, 2023, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through June 30, 2023.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension from June 30, 2023 until July 31, 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,

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

Jessica M. Saxon
Appellate Defender

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

Robert M. Dudek
Chief Appellate Defender

This 30th day of June, 2023.