

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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**RECEIVED**  
**Sep 15 2023**  
S.C. SUPREME COURT

Certiorari to Spartanburg County

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

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JODI STAPLETON,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2023-000473

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

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Counsel for Jodi Lea Stapleton respectfully requests a **final thirty (30) day extension, from September 15, 2023, until October 16, 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 Jodi Lea Stapleton 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.

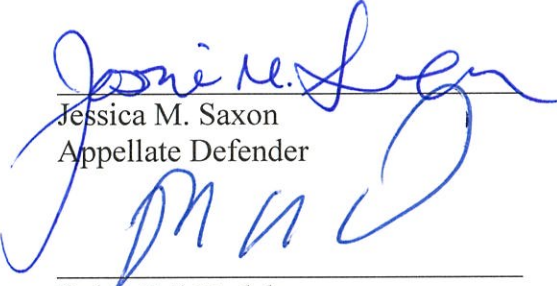
3. Counsel filed the Anders Brief of Appellant and Designation of Matter in the case of The State v. Preston Hancock with the Court of Appeals on September 15, 2023. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Derrick Miller v. The State with this Court on September 6, 2023. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Gene D. Evans, Jr. v. The State with this Court on August 30, 2023. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. William Lee Roseboro with the Court of Appeals on August 11, 2023.

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

5. On September 1, 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 September 30, 2023.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension from September 15, 2023, until October 16, 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,



Jessica M. Saxon  
Appellate Defender

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Robert M. Dudek  
Chief Appellate Defender

This 15th day of September, 2023.