

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

ORIGINAL

Certiorari to Florence County

Honorable William H. Seals, Circuit Court Judge

GEORGIA WOODBERRY,

PETITIONER,

V.

STATE OF SOUTH CAROLINA

RESPONDENT

APPELLATE CASE NO. 2017-001474

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

Counsel for Georgia Woodberry respectfully requests an extension of thirty (30) days 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 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 Georgia Woodberry 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 brief of petitioner in Stephon Robinson v. State with this Court on January 12, 2018. Counsel filed the return to petition for writ of certiorari in State v. Eugene Gardner with the Supreme Court on December 29, 2017. Counsel filed the petition for writ of certiorari in Robin G. Reese v. State with this Court on December 27, 2017. Counsel filed the Motion to Dismiss the Notice of Appeal as Interlocutory in State v. Ronald Hakeem Mack with the Court of Appeals on December 19, 2017. Counsel appeared in general session's court in Richland County for a hearing in State v. Michael A. Smith on December 7, 2017. Counsel filed the initial reply brief in State v. Michael J. Finley with the Court of Appeals on December 5, 2017. Counsel filed the petition for rehearing in Richard Cappell v. State with the Court of Appeals on December 5, 2017. Counsel was a guest speaker at the Appellate Practice Project: Presenting Cases to the Appellate Courts seminar in Columbia, South Carolina on November 30, 2017. Counsel filed the petition for rehearing in Esaiyeus F. Booker v. State with the Court of Appeals on November 29, 2017. Counsel filed the petition for writ of certiorari in Abbdul O. Emmaunel v. State with this Court on November 20, 2017.

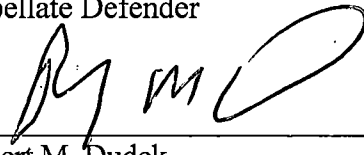
4. Counsel makes this request in good faith and not for purpose of delay.
5. Counsel for the Attorney General's office has been informed of this request.

WHEREFORE, the undersigned counsel would respectfully request a thirty day extension, 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 be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Laura R. Baer
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

Attorney for Petitioner

January 17, 2018

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Florence County
Honorable William H. Seals, Circuit Court Judge

GEORGIA WOODBERRY,

PETITIONER,

V.

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RESPONDENT

CERTIFICATE OF SERVICE

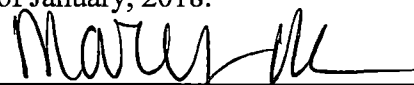
I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon Lindsey McCallister, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 17th day of January, 2018.



Laura R. Baer
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 17th day
of January, 2018.

 (L.S.)
Notary Public for South Carolina
My Commission Expires: May 12, 2027.