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APR 29 2019

STATE OF SOUTH CAROLINA ^{SC} SUPREME COURT
IN THE SUPREME COURT

Certiorari to Berkeley County
Honorable Roger M. Young Circuit Court Judge

Julie L. Gordon-Gookins PETITIONER

v.

State of South Carolina RESPONDENT

APPELLATE CASE NO. 2018-001409

DEFENDANT'S MOTION FOR EXTENTION
OF TIME TO FILE PRO SE RESPONSE
TO PETITION OF JOHNSON BRIEF
Johnson v. State 294 S.C. 310, 364 S.E.2d 201

Comes Now the Defendant/Movant, Julie L. Gordon-Gookins in Pro Se, in necessity, and hereby Moves this Honorable Court to Issue an Order granting a ninety (90) day extention of time to file her motion/Answer to petition filed by counsel in a Pro Se manner.

The Movant/Defendant avers that she just recently became aware that her counsel

was moving to be removed as Counsel there by leaving her an uneducated as to the law Defendant to represent herself.

The Movant/Defendant needs more time to gather information and wishes to request for relief, in GOOD FAITH. The Movant/Defendant currently has no choice but to represent herself in pro se, in necessity. The Movant/Defendant again has no training of the field of law and needs the additional time to research her case.

The Movant/Defendant has access to a limited law library as it contains two computers to facilitate roughly 700 inmates here at CCCI. What's more, after waiting her turn, the Movant/Defendant is limited to ONLY two (2) hours of research and then must wait her turn again.

This motion is made in GOOD FAITH, in the interest of justice, and not meant to delay the proceedings. The State nor any other adverse party will be prejudiced by a ninety (90) day delay.

Wherefore Now, above premises considered,
the movant/Defendant respectfully Moves
this Honorable Court to Grant her a
ninety (90) day extention of time to file
her PRO SE response to the petition
file by her previous Counsel.

Done this 23 , Day of April
2019.

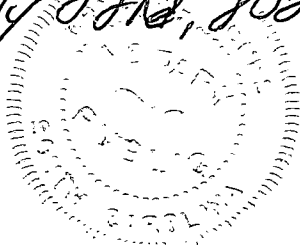
Respectfully Submitted,
Julie Gordon - Gookins
Julie L. Gordon-Gookins
370329
CGGC I-Blue Ridge C#40A"
4450 Broad River Rd.
Columbia, S.C. 29210
Camille Graham Correctional
Institution

State of South Carolina

23rd of April 2019

Crystal Jones

Expires July 22nd, 2019



CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that I have served a copy of this motion upon the Clerk of this Court, via U.S. Mail, properly addressed, First-Class postage prepaid, placing into the internal mailing system as made available to inmates for legal mail, at the CGGC.I. The Movant/Defendant further requests that a copy of this [her] pleading be forwarded to all interested parties via the CM/ECF system, as she is detained, indigent, and has no other means.

Done This 23 Day of April, 2019.

Respectfully Submitted,
Julie L. Gordon Gookins

Julie L. Gordon-Gookins
370329

CGGC I "Blue Ridge C#40-A"

4450 Broad River Rd.

Columbia, SC 29210

Camille Graham Griffin

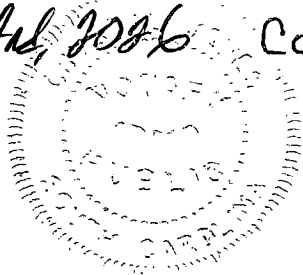
Correctional Institution

State of South Carolina

23rd of April 2019

Crystal Jones

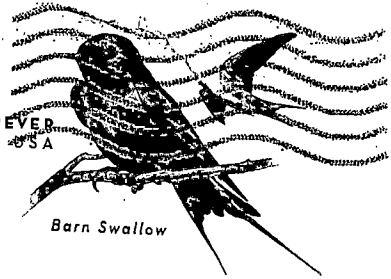
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COLUMBIA SC 290

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Clerk of Court
Daniel E. Shearouse
P.O. Box 11330
Columbia, SC 29211

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