

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Richland County

J. Derham Cole, Circuit Court Judge

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DEC 23 2019

SC Court of Appeals

ZACOATA LOPEY,

PETITIONER,

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DEC 23 2019

V.

STATE OF SOUTH CAROLINA,

S.C. SUPREME COURT

RESPONDENT.

APPELLATE CASE NO. 2019-000320

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

Counsel for Zacoata Lopey 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 the 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 December 23, 2019.

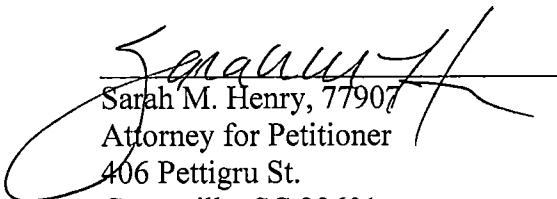
2. Counsel for Zacoata Lopey respectfully requests an extension of time. Counsel was recently appointed on this case, counsel was out of town for several weeks prior to this due date, counsel returned from being out of town at the end of last week, and counsel's office will

be closed starting on December 20th for the holidays. Further due to issues scheduling issues with SCDC counsel has not been able to meet with the client, and counsel needs additional time to discuss the case with the client and review issues in this case.

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

WHEREFORE, the undersigned counsel would respectfully request a thirty-day (30) 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 all filing time limits in this case be held in abeyance pending a ruling on this motion.

Respectfully submitted,


Sarah M. Henry, 77907
Attorney for Petitioner
406 Pettigru St.
Greenville, SC 29601
(864) 478-8324
(864) 232-9555
sarah@sarahmhenrylaw.com

December 20, 2019.

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Appeal from Richland County

J. Derham Cole, Circuit Court Judge

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SC Court of Appeals

ZACOATA LOPEY,

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V.

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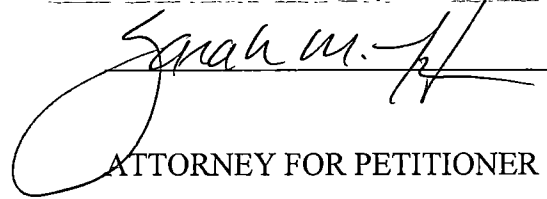
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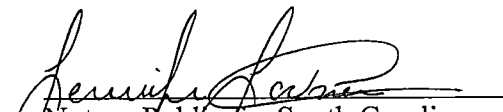
S.C. SUPREME COURT

CERTIFICATE OF SERVICE

I certify that a copy of the Motion for an Extension of Time in which to file the Petition for Writ of Certiorari and Appendix in the above referenced case has been served upon Samuel Key, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, by placing a copy in the mail to the above listed address on December 20, 2019.


ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me
this 20th day of December, 2019.


Notary Public for South Carolina
My Commission Expires: 10/02/2029

SARAH HENRY LAW

SARAH M. HENRY
SARAH@SARAHMHENRYLAW.COM
SARAHMHENRYLAW.COM
864.478.8324/864.232.9555(F)

406 PETTIGRU SREET
GREENVILLE, SC 29601

December 20, 2019

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SC Court of Appeals

Ashli Thompson
Court of Appeals
1220 Senate St.
Columbia, SC 29201

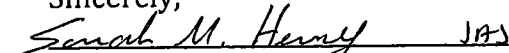
RE: Certificate of Service and Motion for Extension of Time
Zacoata Lopey v. State of South Carolina

Ashli,

Please find enclosed a Certificate of Service and a Motion for an Extension of Time to File the Petition for Writ of Certiorari and Appendix.

If you have any questions, please let me know at 864-478-8324 or
info@sarahmhenrylaw.com.

Sincerely,

 JRS

Sarah M. Henry #77907
Attorney for Defendant
406 Pettigru St.
Greenville, SC 29601
(864) 478-8324/232-9555(fax)

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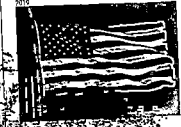
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