

SARAH HENRY LAW

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406 PETTIGRU SREET
GREENVILLE, SC 29601

January 21, 2020

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

RECEIVED

JAN 24 2020

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

SC Court of Appeals

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,

Sarah M. Henry JAH

Sarah M. Henry #77907

Attorney for Defendant.

406 Pettigru St.

Greenville, SC 29601

(864) 478-8324/232-9555(fax)

RECEIVED
JAN 27 2020
S.C. SUPREME COURT



Sarah Henry <sarah@sarahmhenrylaw.com>

Re: Zacoata Lopey v. State of South Carolina (2019-000320)

Samuel Key <SKey@scag.gov>
To: Sarah Henry <sarah@sarahmhenrylaw.com>

Sarah,

Yes I consent to a third extension.



Samuel L. Key
Assistant Attorney General
Post-Conviction Relief Section

S.C. Attorney General's Office
Rembert C. Dennis Building
1000 Assembly St.
Columbia, SC 29201

Office: (803) 734-3737
skey@scag.gov

From: Sarah Henry <sarah@sarahmhenrylaw.com>
Sent: Tuesday, January 21, 2020 4:25 PM
To: Samuel Key <SKey@scag.gov>
Subject: Re: Zacoata Lopey v. State of South Carolina (2019-000320)

Hi Samuel,
[Quoted text hidden]
[Quoted text hidden]

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JAN 27 2020

S.C. SUPREME COURT

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Richland County

J. Derham Cole, Circuit Court Judge

ZACOATA LOPEY,

RECEIVED

JAN 24 2020

SC Court of Appeals

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

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 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 January 22, 2020.
2. Counsel for Zacoata Lopey respectfully requests an extension of time. Counsel has been out of town for the majority of December and January and needs additional time to

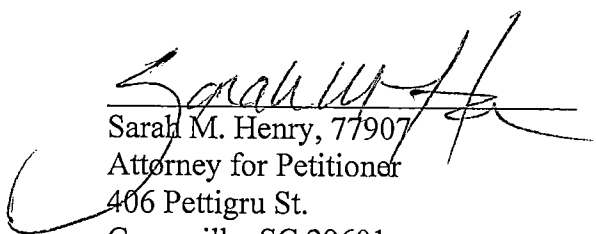
review issues in this case and draft the Petition. Given the number of extensions previously granted counsel believes that no further extensions will be necessary.

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 and consents to this request for an extension.

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

January 21, 2020.

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Appeal from Richland County

J. Derham Cole, Circuit Court Judge

ZACOATA LOPEY,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

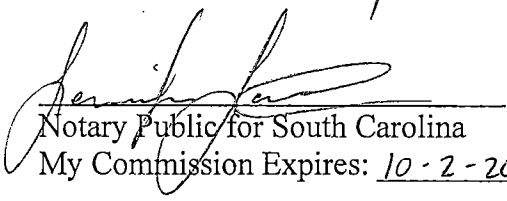
RESPONDENT.

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 January 21, 2020.


ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me
this 21st day of January, 2020.


Notary Public for South Carolina

My Commission Expires: 10-2-2029.

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JAN 24 2020

SC Court of Appeals

Sarah M Henry Law
406 Pettigru St.
Greenville, SC 29601



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SC Court of Appeals

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

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