

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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**ORIGINAL**

Certiorari to Richland County  
R. Scott Sprouse, Circuit Court Judge

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**RECEIVED**

FEB 14 2020

CHRISTOPHER HELLER,

S.C. SUPREME COURT  
PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2019-001408

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

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Counsel for Christopher Heller 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:

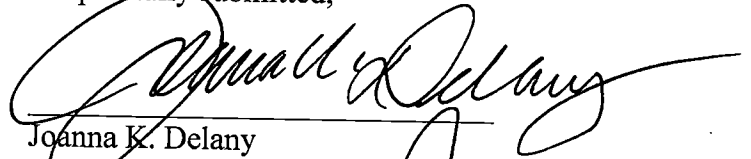
1. The petition for writ of certiorari and appendix are due to be served and filed with the Court today.
2. Counsel for Christopher Heller respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions previously 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 Johnson petition for writ of certiorari and accompanying appendix in the case of Sara Hodson v. State in this Court on February 11, 2020. Counsel filed the petition for rehearing in the case of The State v. Alqi Dhimo with the Court of Appeals on February 7, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Donald Peters v. The State with this Court on February 4, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Travis Hair v. The State with this Court on January 24, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Sandy Westmoreland v. The State with this Court on January 16, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Phillip Monroe v. The State with this Court on January 13, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Henry Gray v. The State with this Court on January 2, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Kemonie Jones v. The State with this Court on December 30, 2019.

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 for writ of certiorari and appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Joanna K. Delany  
Appellate Defender



Robert M. Dudek  
Chief Appellate Defender

This 14<sup>th</sup> day of February, 2020.

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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CHRISTOPHER HELLER,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

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CERTIFICATE OF SERVICE


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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 Lindsey McCallister, Esquire, at the Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, this 14<sup>th</sup> day of February, 2020.

  
Joanna K. Delany  
Appellate Defender

ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me  
this 14<sup>th</sup> day of February, 2020.

 (L.S.)

Notary Public for South Carolina

My Commission Expires: December 31, 2029