

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Calhoun County

Honorable Maite Murphy, Circuit Court Judge

JOHN EDWARD HAYNES,

**ORIGINAL
RECEIVED**
FEB 24 2020
S.C. SUPREME COURT

PETITIONER,

V.

STATE OF SOUTH CAROLINA

RESPONDENT

APPELLATE CASE NO. 2019-001640

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

Counsel for John Edward Haynes 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 John Edward Haynes 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 petition for writ of certiorari in the case of Terry Cooper v. The State on February 3, 2020 with the Supreme Court. Counsel filed the petition for writ of certiorari in the case of Keishawn McManus v. The State on January 6, 2020 with the Supreme Court. Counsel filed the petition for rehearing in the case of The State v. John Mack with the Court of Appeals on January 2, 2020. Counsel filed the petition for writ of certiorari in the case of David Mooney v. The State on January 2, 2020 with the Supreme Court. Counsel filed the petition for writ of certiorari in the case of Fred Madden v. The State on December 16, 2019 with the Supreme Court.

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,

Jessica M. Saxon
for Jessica M. Saxon
Appellate Defender

Robert M. Dudek
Robert M. Dudek
Chief Appellate Defender

Attorney for Petitioner

February 24, 2020

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Calhoun County

Honorable Maite Murphy, Circuit Court Judge

JOHN EDWARD HAYNES,

PETITIONER,

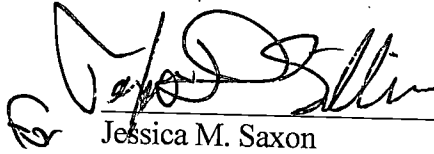
V.

STATE OF SOUTH CAROLINA

RESPONDENT

CERTIFICATE OF SERVICE

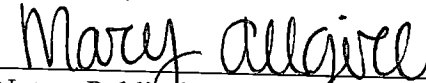
I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon Benjamin Limbaugh, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 24th day of February, 2020.



Jessica M. Saxon
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 24th day
of February, 2020.

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