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MAR 18 2020

S.C. SUPREME COURT

ORIGINAL

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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

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CHRISTOPHER HELLER,

PETITIONER,

V.

THE STATE,

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 a **final thirty (30) day extension, until April 15, 2020**, 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 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 today. The Court has granted counsel two previous extensions.
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 the Supreme 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 the Supreme 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 the Supreme 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 the Supreme Court on January 16, 2020.

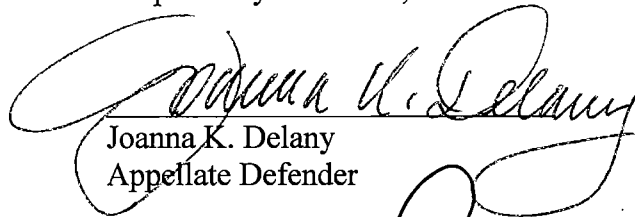
4. Counsel makes this request in good faith and not for purpose of delay.

5. Counsel for the Attorney General's office has been informed of this request as shown by signature below.

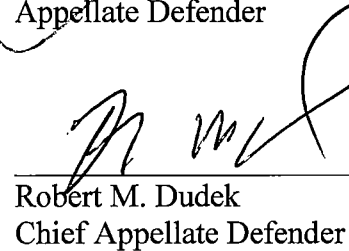
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until April 15, 2020**, in which to file the Petition for Writ of Certiorari and Appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the Petition for Writ of Certiorari and Appendix be held in abeyance pending a ruling on this motion.

This 16th day of March, 2020.

Respectfully submitted,

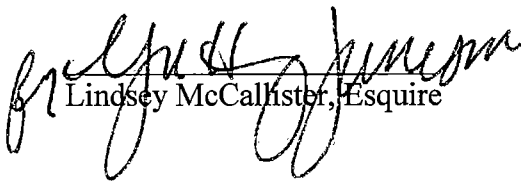


Joanna K. Delany  
Appellate Defender



Robert M. Dudek  
Chief Appellate Defender

I consent:



Lindsey McCallister, Esquire