

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to York County

Honorable Grace Gilchrist Knie, Circuit Court Judge

**RECEIVED**

**Jun 11 2020**

S.C. SUPREME COURT

JENNIFER LYNN DALE,

PETITIONER,

V.

STATE OF SOUTH CAROLINA

RESPONDENT

APPELLATE CASE NO. 2020-000062

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

Counsel for Jennifer Lynn Dale 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 Jennifer Lynn Dale 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 Sylvester Johnson v. The State on May 20, 2020 with the Supreme Court. Counsel filed the petition for writ of certiorari in the case of Christian Rollins v. The State on May 20, 2020 with the Supreme Court. Counsel filed the petition for writ of certiorari in the case of John Haynes v. The State on May 14, 2020 with the Supreme Court. Counsel filed the petition for writ of certiorari in the case of Gerald Green v. The State on May 5, 2020 with the Supreme Court. Counsel filed the initial brief of appellant in the case of The State v. Mario Moise on April 13, 2020 with the Court of Appeals. Counsel filed the petition for rehearing in the case of Marie Faltas v. The State on April 7, 2020 with the Supreme Court. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of John Willie Mack v. The State on March 3, 2020 with the Supreme Court. Counsel filed the petition for writ of certiorari in the case of Devatee Clinton v. The State on March 3, 2020 with the Supreme Court.

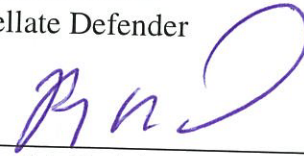
4. Counsel makes this request in good faith and not for purpose of delay.
5. Counsel for the Attorney General's office has been informed of this request.

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,

s/Jessica M. Saxon

Jessica M. Saxon  
Appellate Defender



Robert M. Dudek  
Chief Appellate Defender

Attorney for Petitioner

June 11, 2020