

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Certiorari to Florence County

William H. Seals, Circuit Court Judge

RECEIVED

Jun 15 2020

SC Court of Appeals

GEORGIA WOODBERRY

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

**PETITION FOR EXTENSION TO FILE
BRIEF OF PETITIONER**

The undersigned counsel would respectfully request a thirty-day extension in which to file the brief of petitioner in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following exigent circumstances:

1. The brief of petitioner in this case is due to be served and filed today, having been extended by one prior order of this Court.

2. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Carlos Anthony Dennison with the Court of Appeals on June 10, 2020. Counsel had oral argument before the Court of Appeals in the case of Terrance L. Bland v. The State on June 3, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Alqi Dhimo v. State in this Court on May 29, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Curnez Ellerbee with the Court of Appeals on May 8, 2020. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Marcus A. Nelson v. State in this Court on April 27, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Timothy Montez

Wright v. State in this Court on April 23, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Christopher Heller v. State in this Court on April 15, 2020.

3. This request is made in good faith, and not for purposes of delay.

WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension in which to file the brief of petitioner in this case. Counsel requests that the time limits for filing the brief of petitioner be held in abeyance pending a ruling on this motion.

Respectfully submitted,

s/Joanna K. Delany

Joanna K. Delany
Appellate Defender

June 15, 2020

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Certiorari to Florence County
William H. Seals, Circuit Court Judge

RECEIVED
Jun 15 2020
SC Court of Appeals

GEORGIA WOODBERRY.

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

CERTIFICATE OF SERVICE

Pursuant to the Supreme Court's Order "RE: Operation of the Appellate Courts During the Coronavirus Emergency," dated March 20, 2020, the undersigned hereby certifies a true copy of the petition for extension in which to file the brief of petitioner in the above-referenced case has been served upon Lindsey McCallister, Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), this 15th day of June, 2020."

s/Joanna K. Delany

Joanna K. Delany
Appellate Defender

ATTORNEY FOR PETITIONER