

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Appeal from Charleston County
Daniel F. Pieper, Circuit Court Judge

RECEIVED

Jun 29 2020

S.C. SUPREME COURT

JOE LEWIS HOLMES,

PETITIONER,

v.

THE STATE,

RESPONDENT.

APPELLATE CASE NO. 2019-001493

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

Counsel for Joe Lewis Holmes 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 Joe Lewis Holmes respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time, including the fact that counsel recently experienced a family medical emergency. 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 Anders brief of appellant and designation of matter in the case of The State v. Devontre Cortell Jackson with the Court of Appeals on May 28, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Malikaih Taylor v. The State with this Court on May 27, 2020. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Ravon D. Hamer v. The State with this Court on May 13, 2020. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Candice R. Beasley v. The State with this Court on May 4, 2020.

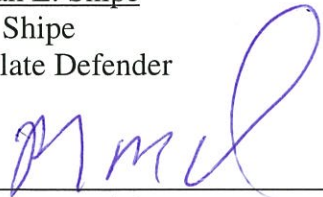
4. Counsel makes this request in good faith and not for purpose of delay.

5. Counsel for the Attorney General's office has been informed of this request.

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,

s/ Sarah E. Shipe
Sarah Shipe
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 29th day of June, 2020.