

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to York County

Honorable Grace Gilchrist Knie, Circuit Court Judge

JENNIFER LYNN DALE,

PETITIONER,

V.

STATE OF SOUTH CAROLINA

RESPONDENT

APPELLATE CASE NO. 2020-000062

MOTION FOR EXTENSION TO FILE
PETITION FOR WRIT OF CERTIORARI
AND ACCOMPANYING APPENDIX

The undersigned counsel respectfully requests a **final thirty-day extension, until August 12, 2020**, in which to file the petition for writ of certiorari and accompanying appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The petition for writ of certiorari and accompanying appendix in this case are due to be served and filed today.

2. Counsel filed the return petition for writ of certiorari in the case of Marie Faltas v. The State on July 9, 2020 with the Supreme Court. Counsel filed the petition for writ of certiorari in the case of Danielle Peay v. The State on July 1, 2020 with the Supreme Court. Counsel filed the initial brief of appellant in the case of The State v. Amy Taylor on June 15, 2020 with the Court of Appeals. Counsel filed the petition for writ of certiorari in the case of Christian Rollins

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v. The State on June 9, 2020 with the Supreme Court. Counsel filed the petition for writ of certiorari in the case of Sylvester Johnson v. The State on June 9, 2020 with the Supreme Court. Counsel filed the petition for writ of certiorari in the case of Dashon Garner v. The State on May 26, 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.

3. Opposing counsel, the Attorney General's Office, has graciously consented to this extension request by way of the thirty day written consent dated June 23, 2020 by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through July 31, 2020.

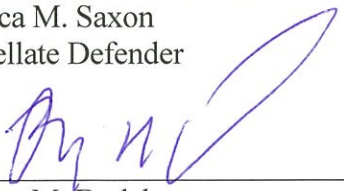
4. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty-day extension, until August 12, 2020**. Counsel respectfully requests that the time limits for filing the petition for writ of certiorari and accompanying appendix 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