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Jul 15 2020

SC Court of Appeals

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Certiorari to Florence County

William H. Seals, Circuit Court Judge

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GEORGIA WOODBERRY,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

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

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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 two prior orders of this Court.

2. Counsel filed an Anders brief of appellant and Record on Appeal in the case of The State v. Thomas R. Marett with this Court on July 10, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Rodney Galimore v. State in the Supreme Court on July 1, 2020. Counsel filed a petition for rehearing in the case of The State v Christian Anthony Himes with this Court on June 25, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Wanda Jane Crumpton with this Court on June 24, 2020. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Derrick Lamont Wade v. State in the Supreme Court on June 18, 2020. Counsel filed the return to the petition for rehearing in the case of The State v.

Patrick O'Neil McGowan with this Court on June 15, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Carlos Anthony Dennison with this Court on June 10, 2020. Counsel had oral argument before this Court 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 the Supreme Court on May 29, 2020.

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

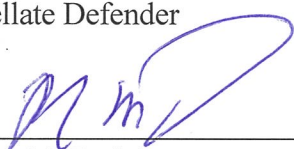
4. Opposing counsel, for the Attorney General's Office, has graciously consented to this extension request by way of the general consent granted by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through July 31, 2020. That general consent was dated June 23, 2020.

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



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Robert M. Dudek  
Chief Appellate Defender

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CERTIFICATE OF SERVICE

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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 15<sup>th</sup> day of July, 2020.

*s/ Joanna K. Delany*

Joanna K. Delany  
Appellate Defender

ATTORNEY FOR PETITIONER