

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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Appeal from Charleston County

Daniel F. Pieper, Circuit Court Judge

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**RECEIVED**

**Jul 29 2020**

S.C. SUPREME COURT

JOE LEWIS HOLMES,

PETITIONER,

V.

THE STATE,

RESPONDENT.

APPELLATE CASE NO. 2019-001493

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

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Counsel for Joe Lewis Holmes respectfully requests a **final thirty (30) day extension, until August 28, 2020**, 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 third 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. The Court has granted counsel two previous extensions.

2. Counsel for Joe Lewis Holmes 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 Johnson petition for writ of certiorari and accompanying appendix in the case of Aaron Alonzo Brown v. The State with this Court on July 27, 2020. Counsel filed the Anders brief of appellant and designation of matter in the case of The State v. Quintin Mills with the Court of Appeals on July 27, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Faasiu Toese v. The State with this Court on July 17, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Gary Jerrell Means, Jr. v. The State with this Court on June 30, 2020. 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.

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

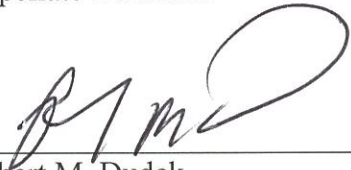
5. Opposing counsel, the Attorney General's Office, has graciously consented to this extension request by way of the extended thirty-day general consent granted by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through July 31, 2020. That extended, emailed general consent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

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until August 28, 2020**, 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.

This 29th day of July, 2020.

Respectfully submitted,

  
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Sarah Shipe  
Appellate Defender

  
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Robert M. Dudek  
Chief Appellate Defender