

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Appeal from Anderson County

Scott R. Sprouse, Circuit Court Judge

RECEIVED

Aug 31 2020

S.C. SUPREME COURT

JOANIE HOLCOMBE,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2020-000495

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

Counsel for Joanie Holcombe 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 Joanie Holcombe 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 his caseload, counsel hopes that no further extension requests will be required.

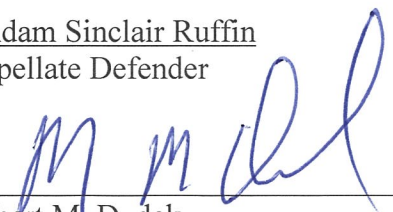
3. Counsel filed the Anders brief of appellant and record on appeal in the case of State v. Donald Frank Halstead with the Court of Appeals on August 26, 2020. Counsel filed the Anders brief of appellant and record on appeal in the case of State v. Rasheem Thomas with the Court of Appeals on July 31, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of Michael Williams v. State with the Court of Appeals on July 27, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of Sherry McMahan v. State with the Court of Appeals on July 27, 2020. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Justin Jermaine Johnson v. State with the Supreme Court on July 27, 2020. Counsel filed the Anders brief of appellant and record on appeal in the case of State v. Tequan Holmes with the Court of Appeals on June 25, 2020. Counsel makes this request in good faith and not for purpose of delay.

4. On July 30, 2020, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through August 31, 2020.

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/Adam Sinclair Ruffin
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 31st day of August, 2020.