

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Anderson County  
Honorable R. Scott Sprouse, Circuit Court Judge

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**RECEIVED**

**Sep 30 2020**

S.C. SUPREME COURT

JOANIE HOLCOMBE,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2020-00495

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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 Joanie Holcombe respectfully requests a **final thirty (30) day extension, until October 30, 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 filed with the Court today. The Court has granted counsel two previous extensions.
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.

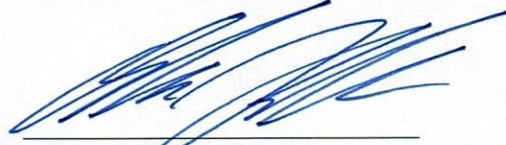
3. Counsel filed the initial brief of appellant and designation of matter in the case of Eric Charles Peterson v. State with the Court of Appeals on September 25, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of Curtis Allen Babb, Jr. v. State with the Court of Appeals on September 23, 2020. 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 this Court on July 27, 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 thirty day general consent granted by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through September 30, 2020. That emailed general consent was dated August 26, 2020.

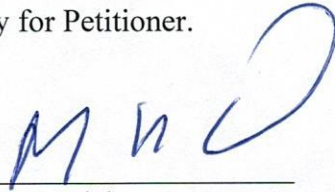
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until October 30, 2020**, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'A. S. Ruffin', written over a horizontal line.

Adam S. Ruffin  
Appellate Defender

Attorney for Petitioner.

A handwritten signature in blue ink, appearing to read 'R. M. Dudek', written over a horizontal line.

Robert M. Dudek  
Chief Appellate Defender

This 30<sup>h</sup> day of September, 2020.