

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Richland County

J. Derham Cole, Circuit Court Judge

RECEIVED

Nov 05 2020

SC Court of Appeals

ZACOATA LOPEY,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2019-000320

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

Counsel for Zacoata Lopey respectfully requests an extension of thirty (30) days in which to file the amended Petition for Writ of Certiorari and amended Appendix in this case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. This is the first request for an extension. In support of this request, counsel shows:

1. Counsel made a motion to amend the Petition for Writ of Certiorari and Appendix, and the court issued an order granting counsel 10 days to submit the amended documents on October 28, 2020. The amended Petition for Writ of Certiorari and Appendix are currently due to be served and filed with the Court on November 6, 2020.

2. Counsel for Zacoata Lopey respectfully requests an extension of time. Counsel needs to have the appendix professionally redacted and renumber, and then modify the Petition to reflect the new appendix citation. Counsel should be able to accomplish this and have the amended documents submitted to the court within thirty (30) days.

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

4. Counsel for the Attorney General's office has been informed of this request and consents to this request for an extension.

WHEREFORE, the undersigned counsel would respectfully request a thirty-day (30) extension, in which to file the amended Petition for Writ of Certiorari and amended Appendix in this case based upon the above exigent circumstances. Counsel requests that all filing time limits in this case be held in abeyance pending a ruling on this motion.

Respectfully submitted,

s/Sarah Henry
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Attorney for Petitioner

November 5, 2020
Greenville, SC

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PROOF OF SERVICE

I certify that a copy of the Motion for an Extension of Time in which to file the amended Petition for Writ of Certiorari and amended Appendix in the above referenced case has been served upon Samuel Key and Michael Davidson by electronic mail to the email listed below on November 5, 2020.

Samuel Key (SKey@scag.gov)

Michael Davidson (michaeldavidson@scag.gov)

s/Sarah Henry

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Attorney for Petitioner

November 5, 2020
Greenville, SC