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**Apr 07 2021**

S.C. SUPREME COURT

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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Appeal from Georgetown County

William H. Seals, Circuit Court Judge

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JAMIE L. GILES,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2020-001364

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

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Counsel for Jamie L. Giles 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 Jamie L. Giles 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.

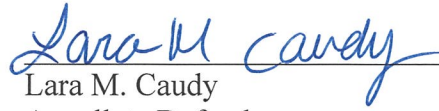
3. Counsel is preparing for the oral argument in The State v. Shane Alexander Washington, which is scheduled for April 13, 2021, before the Supreme Court. On March 22, 2021, counsel filed the brief of petitioner in Gene Tony Cooper v. The State with the Court of Appeals. On March 15, 2021, counsel filed the initial brief of appellant and designation of matter in The State v. David Viron Lewis Garrett with the Court of Appeals. On February 22, 2021, counsel filed the petition for writ of certiorari and accompanying appendix in Andrew Antonio Clemons v. The State with the Supreme Court. On February 8, 2021, counsel filed the brief of respondent in Dale Gould v. State with the Court of Appeals. On February 3, 2021, counsel had an oral argument in The State v. Jonathan Donell Rhodes before the Supreme Court. On January 27, 2021, counsel filed the petition for writ of certiorari and accompany appendix in Willie Thomas Starnes v. The State with the Supreme Court.

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

5. On March 30, 2021, 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 April 30, 2021.

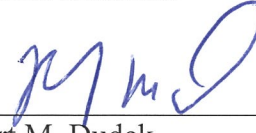
WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension, in which to file the Petition for Writ of Certiorari and Appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the Petition for Writ of Certiorari and Appendix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

Respectfully submitted,



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Lara M. Caudy  
Appellate Defender



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Robert M. Dudek  
Chief Appellate Defender

This 7th day of April, 2021.