

STATE OF SOUTH CAROLINA
In the South Carolina Supreme Court

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Sep 16 2021

S.C. SUPREME COURT

Appeal from Jasper County
The Honorable Carmen Mullen

Appellate Case No. 2018-1488

The State of South Carolina,, Respondent,

v.

Richard Passio, Jr...., Petitioner.

MOTION FOR EXTENSION

Undersigned counsel respectfully requests an additional 4 weeks to file the petition for writ of certiorari and appendix in this matter so it will be due October 14, 2021. It is currently due tomorrow, September 17, 2021. The issues raised in this petition are complex and counsel requests additional time to conduct needed legal research. Counsel also has a suppression hearing in a federal case next week and a federal trial scheduled for October 7, 2021 that is expected to last for 2 days.

September 16, 2021

/s/Elizabeth Franklin-Best
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CERTIFICATE OF SERVICE

Counsel hereby certifies she has served William Schumacher of the SC Attorney General's Office with a copy of this motion on this date, September 16, 2021.

/s/ Elizabeth Franklin-Best