

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Appeal from Sumter County

R. Kirk Griffin, Circuit Court Judge

RECEIVED

Oct 29 2021

S.C. SUPREME COURT

QUENTIN D. HARDY,

PETITIONER,

V.

THE STATE,

RESPONDENT.

APPELLATE CASE NO. 2021-000483

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

Counsel for Quentin D. Hardy respectfully requests a **final thirty (30) day extension, until November 29, 2021**, 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 served and filed with the Court today, October 29, 2021. The Court has granted counsel two previous extensions.
2. Counsel for Quentin D. Hardy 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 filed the petition for writ of certiorari and accompanying appendix in the case of Kendall Arnold v. The State with this Court on October 22, 2021. Counsel filed the petition for rehearing in the case of The State v. Carmie Josette Nelson with the Court of Appeals on September 30, 2021. Counsel is attending the Annual Public Defender Conference, which is being held September 27-29, 2021, in Myrtle Beach, South Carolina. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Favian A. Hayes v. The State with this Court on September 15, 2021. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Alton Wesley Gore v. The State with this Court on September 1, 2021.

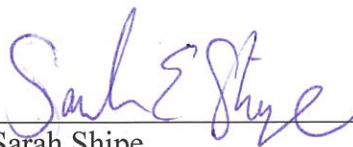
4. Counsel makes this request in good faith and not for purpose of delay.

5. Opposing counsel, the Attorney General's Office, has graciously consented to this extension request by way of the extended thirty-day general consent granted by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through October 31, 2021. That extended, emailed general consent was dated September 30, 2021.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until November 29, 2021**, 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.

This 29th day of October, 2021.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Sarah Shipe", written over a horizontal line.

Sarah Shipe
Appellate Defender

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

Robert M. Dudek
Chief Appellate Defender