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S.C. SUPREME COURT

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Aiken County
Honorable Edgar W. Dickson, Circuit Court Judge

WILLIAM HENRY BLAKE,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2021-000708

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

Counsel for petitioner 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 petitioner 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 to the Court of Appeals in the case of The State v. Brandon Jewel Lee with this Court on November 1, 2021. Counsel filed the brief of petitioner in the case of Joey Clark v. The State with the Court of Appeals on October 27, 2021. Counsel filed the brief of petitioner in the case of Bilal Haynesworth v. The State with the Court of Appeals on October 22, 2021. Counsel filed the reply brief of petitioner and appendix in the case of The State v. Michael N. Frasier with this Court on October 11, 2021. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of The State v. Jane Katherine Hughes with this Court on October 1, 2021. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of The State v. Jahru Harold Smith with this Court on September 30, 2021. Counsel filed the reply brief of petitioner in the case of The State v. Johnathan Green with this Court on September 23, 2021. Counsel had an oral argument in the case of The State of South Carolina v. Kelvin Jones before this Court on September 22, 2021. Counsel filed the reply to return to petition for writ of certiorari in the case of Roy Gene Sutherland, III v. The State of South Carolina with this Court on September 9, 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 thirty day general consent granted by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through November 30, 2021. That emailed general consent was dated October 29, 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 be held in abeyance pending a ruling on this motion.

Respectfully submitted,

s/Kathrine H. Hudgins
Kathrine H. Hudgins
Appellate Defender
Attorney for Petitioner



Robert M. Dudek
Chief Appellate Defender

This 3rd day of November, 2021