

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Greenville County

J. Cordell Maddox, Circuit Court Judge

RECEIVED

Nov 22 2021

S.C. SUPREME COURT

TERRY MCCALL,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2021-000385

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

Counsel for Terry McCall respectfully requests a **final thirty (30) day extension, until December 22, 2021**, in which to serve and 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. The Court has granted counsel two previous extensions.
2. Counsel for Terry McCall 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 Johnson Petition for Writ of Certiorari in the case of Terry Watson v. The State with the Supreme Court of South Carolina on November 17, 2021.

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

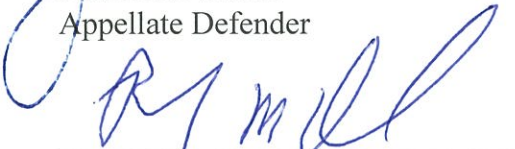
5. Counsel for the Attorney General's office has been informed of this request.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until December 22, 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.

Respectfully submitted,



Jessica M. Saxon
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 22nd day of November, 2021.