

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Sumter County

Honorable R. Kirk Griffin, Circuit Court Judge

MICHAEL ROSE,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2021-000484

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

Counsel for Michael Charles Rose respectfully requests an extension of thirty (30) days 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 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 Michael Charles Rose respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the

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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.

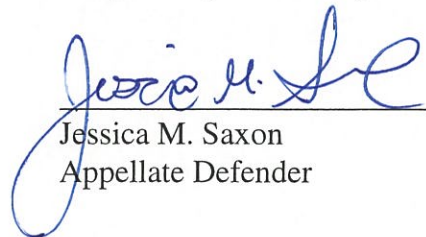
3. Counsel filed a Reply to Respondent's Return to Appellant's Motion to Strike and Motion to Amend Designation of Matter in the case of The State v. James Winston Almond with the Court of Appeals on December 7, 2021. Counsel filed the Johnson Petition for Writ of Certiorari in the case of Terry Watson v. The State with the South Carolina Supreme Court on November 17, 2021.

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

5. On November 30, 2021 opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by December 31, 2021.

WHEREFORE, the undersigned counsel would respectfully request a thirty (30) day extension, in which to serve and file the Petition for Writ of Certiorari and Appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for serving and 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

This 20th day of December, 2021.