

February 10, 2022

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**SC Court of Appeals**

Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Re: *Larry Blackwell, #176790 v. SCDPPPS*  
Appellate Case No. 2021-001162

Dear Ms. Kitchings:

The Court ordered Appellant to file a return to Respondent's "Motion to Strike" material in the proposed Record on Appeal ten days from February 3, 2022, meaning the return is due no later than Monday, February 14, 2022. We respectfully request an extension of seven days, until Monday, February 21, 2022, in which to serve and file the motion. In support of this request, counsel would offer the following:

Over the past two weeks, undersigned counsel Hannah Freedman has been preparing an appeal to the Administrative Law Court that is due to be filed next week and has been preparing a juvenile client for a competency evaluation that took place on Tuesday, February 8, 2022. She has also been actively working on a capital case in which her client has exhausted his automatically available appellate review and therefore could face an execution date imminently. *State v. Terry*, No. 1997-006197; *see also Owens v. Stirling*, No. 2021-CP-40-02306.

In addition, Ms. Freedman is a co-instructor, with undersigned counsel John Blume, of the Capital Punishment and Juvenile Justice Clinics at Cornell Law School, and classes started at the law school on January 25, 2022. Both Ms. Freedman and Mr. Blume have been occupied with the start of classes. Mr. Blume is also preparing for a parole hearing in which materials must be submitted to the South Carolina Department of Probation, Parole and Pardon Services no later than Wednesday, February 16, 2022. Additionally, Mr. Blume is in the process of drafting a Brief in Opposition to be filed in the Supreme Court of the United States no later than February 25, 2022, and he is working on a state habeas petition due in a capital case in Ohio.

Undersigned counsel Jon Ozmint is a solo practitioner and is in the process of moving his office from Columbia to Greenville. Those efforts were delayed this week to care for his wife who

has been bedridden with a debilitating stomach virus. As a precautionary measure, they both have quarantined until they can both be tested. Over the past two weeks, he has attended numerous board meetings, prepared and reviewed a large parole package to make a deadline, and he is due to travel to Baltimore for three days of meetings with a client's leadership team next week.

By copy of this letter, I am informing Matthew Buchanan, General Counsel for Respondent the South Carolina Department of Probation, Parole & Pardon Services, of our request. Thank you for your assistance in this matter. Should you have any additional questions, please do not hesitate to contact me.

/s/Hannah Freedman  
Hannah Lyon Freedman  
Justice 360  
900 Elmwood Ave., Suite 200  
Columbia, SC 29201  
(803) 765-1044  
hannah@justice360sc.org

cc: Matthew Buchanan, Esq.  
Jon Ozmint, Esq.  
John Blume, Esq.