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S.C. SUPREME COURT

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Appeal from Charleston County
The Honorable Deadra L. Jefferson, Circuit Court Judge

THE STATE,

PETITIONER,

v.

MONTRELLE LAMONT CAMPBELL,

RESPONDENT.

Appellate Case No. 2022-000349

**MOTION FOR SECOND EXTENSION OF TIME TO FILE
PETITION FOR WRIT OF CERTIORARI AND APPENDIX**

The undersigned counsel would respectfully request a final ten (10) day extension in which to file the Petition for Writ of Certiorari and Appendix in the above-referenced case. This is a second extension request. In support of this motion, counsel would respectfully show the Court the following good cause:

Respondent's Petition for Writ of Certiorari and Appendix is due to be filed on Thursday, April 7, 2022. Counsel for Respondent, Lara M. Caudy, Esq. has graciously consented to this extension request. The undersigned attorney has had a number of personal, state, and federal matters to attend to since March 3, 2022. Specifically:

1. Counsel prepared for and attended the deposition of expert witness, Mr. David Price in the Orangeburg County capital Post-Conviction Relief matter of Bayan Aleksey vs. State of South Carolina, 2015-CP-38-764, which took place on March 3, 2022;
2. Counsel filed the Final Brief of Respondent in the matter of The State vs. Jamal D. Coburn, Appellate Case No. 2020-001528, a Lexington County direct appeal matter on March 7, 2022;
3. Counsel filed the Respondent's Reply to Response in Opposition to Motion for Summary Judgment [ECF #27] in the matter of Shannon M. Lancaster vs. Warden of Perry Correctional Institution, C/A No. 8:21-03591-TMC-JDA on March 23, 2022;
4. Counsel also prepared for the hearing on the post-conviction relief matter of Calvert Myers vs. State of South Carolina, 2018-CP-40-03490, a Richland County matter on March 29, 2022;
5. Counsel is researching and helping prepare the response to Motion for 60(b) in the matter of Steven Vernon Bixby vs. Bryan P. Stirling, Commissioner, South Carolina Department of Corrections; Lydell Chestnut, Deputy Warden of Broad River Correctional Institution Secure Facility, No. 21-5, a capital Federal Habeas matter now pending in the United States Court of Appeals for the Fourth Circuit;
6. Counsel filed the Respondent's Reply to Response in Opposition to Motion for Summary Judgment [ECF #42] in the matter of Ricky Bowman, #348625 vs. Tonya James, Warden of Kershaw Correctional Institution, C/A No. 8:21-cv-995-HMH-JDA on April 1, 2022;
7. Counsel is also preparing the Return and Memorandum of Law in Support of Motion for Summary Judgment in the matter of Eric Wright vs. Donnie Stonebreaker, Jr., C/A No. 0:21-cv-3495-TLW-PJG; and

8. Counsel prepared for and attended oral argument on behalf of the State in the matter of The State vs. Tyrone Anthony Wallace, Jr., Appellate Case No. 2021-000332, a Beaufort County direct appeal matter now pending in the South Carolina Supreme Court today, April 5, 2022.

9. Counsel has been involved in working on **other matters in state and federal court.**

WHEREFORE, for good cause shown, counsel respectfully requests a second and final ten (10) day extension of time to serve and file the Petition for Writ of Certiorari and Appendix. This request is made in good faith, and not for the purposes of delay. This extension will make Respondent's Petition for Writ of Certiorari and Appendix due Monday, April 18, 2022.

Respectfully Submitted,

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April 5, 2022.