

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Aiken County
Jennifer B. McCoy, Circuit Court Judge

RECEIVED

Apr 06 2022

S.C. SUPREME COURT

KAYLA MOORE,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2021-001249

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

Counsel for Kayla Moore respectfully requests an extension of thirty (30) days in which to file the petition for writ of certiorari and accompanying 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 accompanying appendix are due to be served and filed with the Court today.

2. Counsel for Kayla Moore 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 and accompanying appendix in the case of Emmanuel Marquez Rodriguez v. The State of South Carolina with the Supreme Court on March 25, 2022. Counsel filed the reply to the brief of respondent in the case of Joey Clark v. The State of South Carolina with the Court of Appeals on March 22, 2022. Counsel filed the Anders brief of appellant and designation of matter in the case of The State of South Carolina v. Tobias Thomas with the Court of Appeals on March 21, 2022. Counsel had an oral argument in the case of The State of South Carolina v. Johnathan Green in the Supreme Court on March 17, 2022. Counsel had an oral argument in the case of The State of South Carolina v. Michael N. Frasier in the Supreme Court on March 15, 2022. Counsel filed the reply to the state's return to the petition for writ of certiorari to the Court of Appeals in the case of The State of South Carolina v. Byron Labron Rivers with the Supreme Court on February 28, 2022. Counsel filed the brief of respondent in the case of The State of South Carolina v. Guadalupe Guzman Morales with the Supreme Court on February 18, 2022. Counsel filed the initial brief of appellant and designation of matter in the case of The State of South Carolina v. Craig Antonio George with the Court of Appeals on February 11, 2022.

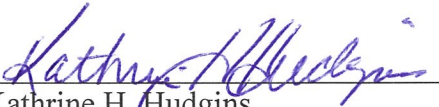
4. Counsel makes this request in good faith and not for purpose of delay.

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 email from Deputy Attorney General Donald J. Zelenka dated March 30, 2022 for all Appellate Defense extensions through April 30, 2022.

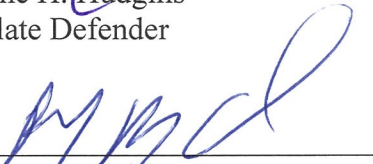
WHEREFORE, the undersigned counsel would respectfully request a thirty day extension, in which to file the petition for writ of certiorari and accompanying appendix in this

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,



Kathrine H. Hudgins
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 6th day of April, 2022.