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Apr 11 2022

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Lexington County

Honorable Walton J. McLeod, IV, Circuit Court Judge

WORTH EDWARD COOK III,

RESPONDENT,

V.

THE STATE

APPELLANT

APPELLATE CASE NO. 2021-001267

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

Counsel for Worth Edward Cook respectfully requests a **final thirty (30) day extension, until May 11, 2022**, 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.
2. Counsel for Worth Edward Cook 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 Anders Brief of Appellant in the case of The State v. Michael Andre Walcott with the Court of Appeals on April 5, 2022. Counsel filed the Final Brief of Appellant and the Final Reply Brief of Appellant in the case of The State v. Gary M. Wirtz with the Court of Appeals on March 28, 2022. Counsel filed the Johnson Petition for Writ of Certiorari in the case of Bruce M. Richardson v. The State with the South Carolina Supreme Court on March 16, 2022. Counsel filed the Final Brief of Appellant in the case of James Winston Almond v. The State with the Court of Appeals on March 9, 2022. Counsel filed the Initial Reply Brief of Appellant in the case of The State v. Gary M. Wirtz with the Court of Appeals on February 24, 2022. Counsel filed the Johnson Petition for Writ of Certiorari in the case of Terry McCall v. The State with the South Carolina Supreme Court on February 22, 2022. Counsel appeared before the Court of Appeals for Oral Argument in the case of Stephen Parten v. The State on February 17, 2022.

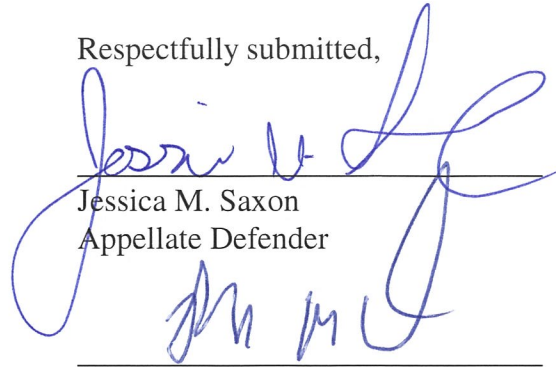
4. Counsel makes this request in good faith and not for purpose of delay.

5. On March 31, 2022, opposing counsel, the Office of the Attorney General, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through April 30, 2022.


WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension until May 11, 2022**, 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 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 11th day of April, 2022.

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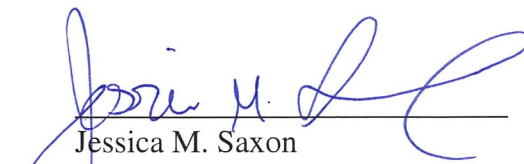
THE STATE

APPELLANT

APPELLATE CASE NO. 2021-001267

CERTIFICATE OF SERVICE

Pursuant to Rule 262(a)(3) and Rule 262(c)(3), SCACR, the undersigned hereby certifies a true copy of the motion for extension in the above-referenced case has been served upon Melody J. Brown, Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), this 11th day of April, 2022.



Jessica M. Saxon
Appellate Defender
ATTORNEY FOR PETITIONER