

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Richland County

Honorable Brian M. Gibbons, Circuit Court Judge

HOLLY JO THOMPSON,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2021-000846

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

Counsel for Holly Jo Thompson respectfully requests an extension of thirty (30) days until May 13, 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 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 Holly Jo Thompson respectfully submits that extraordinary

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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.

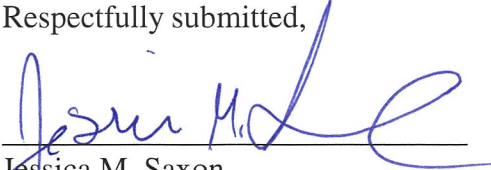
4. Counsel makes this request in good faith and not for purpose of delay.

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 thirty (30) day extension until May 13, 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 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 13th day of April, 2022.