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Apr 18 2022

S.C. SUPREME COURT

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Aiken County

Honorable Courtney Clyburn-Pope, Circuit Court Judge

FRANK MUNS,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2021-001358

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

Counsel for Frank Muns respectfully requests a **final thirty (30) day extension, until May 18, 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 Frank Muns 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.

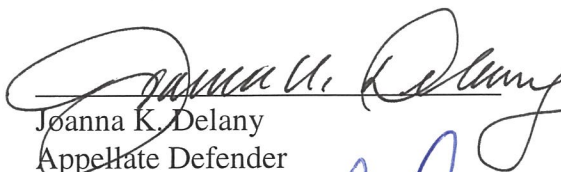
3. Counsel filed the Brief of Petitioner in the case of Tappia Deangelo Green v. The State with the South Carolina Supreme Court on April 14, 2022. Counsel filed the Petition for Rehearing in the case of Joshua A. Reed v. The State with the Court of Appeals on April 8, 2022. Counsel filed the Anders Brief of Petitioner Pursuant to White v. State in the case of Lorgio Morales v. The State with the Court of Appeals on March 29, 2022. Counsel appeared before the Court of Appeals for Oral Arguments in the cases of Devonta Williams v. The State and Georgia Woodberry v. The State on March 15, 2022.

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

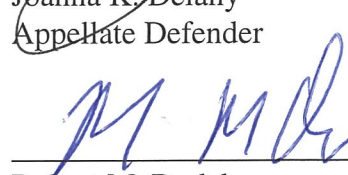
5. On March 31, 2022, opposing counsel, the Office of the Attorney General, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through April 7, 2022.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension until May 18, 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,



Joanna K. Delany
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 18th day of April, 2022.