

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Aiken County

Honorable Jennifer B. McCoy, Circuit Court Judge

KAYLA MOORE,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2021-001249

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

Counsel for Kayla Moore respectfully requests a **final thirty (30) day extension, until June 6, 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 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.

RECEIVED

May 06 2022

S.C. SUPREME COURT


3. Counsel filed the reply to return to petition for writ of certiorari in the case of William Blake v. The State of South Carolina with this Court on May 2, 2022. Counsel filed the petition for writ of certiorari in the case of Kelvin Jones v. The State of South Carolina with the United States Supreme Court on April 29, 2022. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of The State v. Thomas Stephen Acker with this Court on April 25, 2022. Counsel filed the reply brief of petitioner in the case of Nathaniel Mitchell v. The State of South Carolina with the Court of Appeals on April 18, 2022. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Lucruz McCloud v. The State of South Carolina with this Court on April 15, 2022. Counsel filed the reply brief of petitioner in the case of Bilal Haynesworth v. The State of South Carolina with the Court of Appeals on April 7, 2022. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Lindy Lamont Jones v. The State of South Carolina with this Court on April 4, 2022. Counsel filed the petition for writ of certiorari pursuant to Austin v. State in the case of Lindy Lamont Jones v. The State of South Carolina with this Court on April 4, 2022. 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 this Court on March 25, 2022. 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 this 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.

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

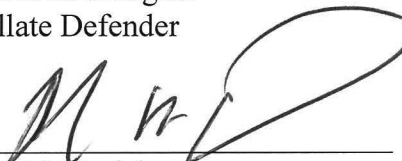
5. Opposing counsel, the Attorney General's Office, has graciously consented to this extension request by way of the thirty-day general consent granted by email from Deputy Attorney General Donald J. Zelenka dated April 28, 2022 for all Appellate Defense extensions through May 31, 2022.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until June 6, 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,



Kathrine H. Hudgins
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 6th day of May, 2022.