

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Richland County

Honorable Brian M. Gibbons, Circuit Court Judge

RECEIVED

May 13 2022

S.C. SUPREME COURT

HOLLY JO THOMPSON,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2021-000846

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

Counsel for Holly Jo Thompson respectfully requests a **final thirty (30) day extension, until June 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 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 Holly Jo Thompson 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 appeared before the Court of Appeals for Oral Argument in the case of Amy N. Taylor v. The State on May 12, 2022. Counsel filed the Johnson Petition for Writ of Certiorari in the case of Jaysen R. Hodge v. The State with the Supreme Court on May 9, 2022. 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.

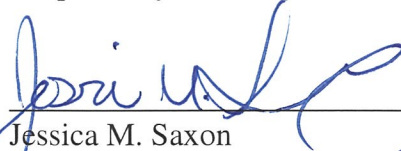
4. Counsel makes this request in good faith and not for purpose of delay.

5. On April 28, 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 May 31, 2022.

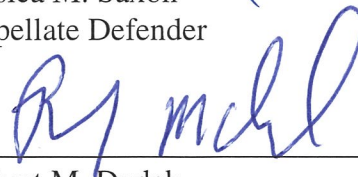
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension until June 13, 2022**, in which to serve and file the Petition for Writ of Certiorari and Appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the 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 13th day of May, 2022.