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Oct 12 2022

S.C. SUPREME COURT

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Sumter County

Honorable L. Casey Manning, Circuit Court Judge

JAELOM JACKSON,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2022-000542

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

Counsel for Jaelon Jackson respectfully requests an extension of thirty (30) days from October 12, 2022 until November 14, 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 Jaelon Markell Jackson 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 his caseload, counsel hopes that no further extension requests will be required.

3. Counsel filed the return to petition for writ of certiorari to the Court of Appeals in the case of The State v. Sylvester Ferguson III, with the Supreme Court on October 12, 2022. Counsel filed the brief of petitioner in the case of Allen Stone v. The State with the Supreme Court on October 10, 2022. Counsel filed the brief of appellant and designation of matter in the case of The State v. Chase Michael Milam with the Court of Appeals on October 3, 2022. Counsel attended the Annual Public Defender Conference, in North Myrtle Beach, South Carolina, on September 19-21, 2022. Counsel had an oral argument in The State v. Corey Jermaine Brown before the Supreme Court on September 14, 2022. Counsel filed the brief of appellant and designation of matter in the case of The State v. Jacob Ryan Aljoe with the Court of Appeals on August 26, 2022. Counsel filed the brief of appellant and designation of matter in the case of The State v. Phillip Richard Knighton with the Court of Appeals on August 23, 2022. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Correy Tremayne Brown with the Court of Appeals on August 17, 2022. Counsel filed the brief of appellant and designation of matter in the case of The State v. Derrick Jajuan Rivera with the Court of Appeals on July 27, 2022. Counsel filed the return to petition for rehearing in the case of The State v. Sylvester Ferguson III with the Court of Appeals on June 27, 2022. Counsel makes this request in good faith and not for purpose of delay.

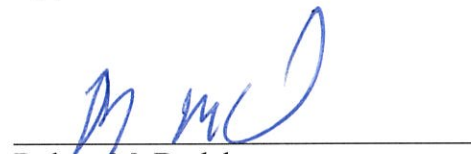
4. On September 28, 2022, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through October 31, 2022.

WHEREFORE, the undersigned counsel would respectfully request a thirty (30) day extension from October 12, 2022 until November 14, 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,



David Alexander
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 12th day of October, 2022.