

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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Certiorari to Spartanburg County

Honorable William A. McKinnon, Circuit Court Judge

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SAMUEL JETER,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2022-000978

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

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Counsel for Samuel Jeremiah Jeter respectfully requests an extension of thirty (30) days from November 7, 2022 until December 7, 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 Samuel Jeremiah Jeter 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.

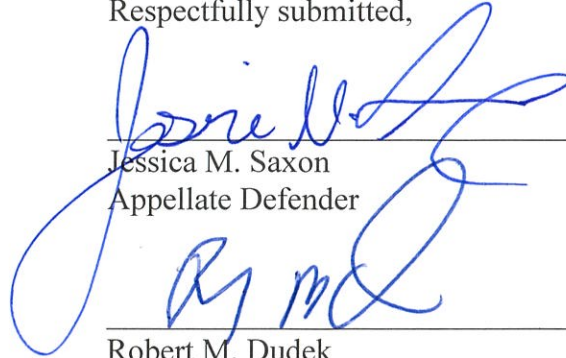
3. Counsel filed the Petition for Writ of Certiorari and the Appendix in the case of Johnny Haggins v. The State with this Court on October 31, 2022. Counsel appeared before this Court for Oral Argument in the case of Joshua Reher v. The State in Rock Hill, South Carolina on October 25, 2022. Counsel filed the Petition for Writ of Certiorari to the Court of Appeals in the case of Justin Cone v. The State with this Court on October 24, 2022. Counsel filed the Reply to Return to the Petition for Writ of Certiorari in the case of Worth Edward Cook III v. The State with the Court of Appeals on October 17, 2022. Counsel filed the Petition for Writ of Certiorari Pursuant to *Mack v. State* and the Appendix in the case of John Willie Mack, Sr. v. The State with the Court of Appeals on September 26, 2022.

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

5. On November 1, 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 November 30, 2022.

WHEREFORE, the undersigned counsel would respectfully request a thirty (30) day extension from November 7, 2022 until December 7, 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,



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Jessica M. Saxon  
Appellate Defender



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Robert M. Dudek  
Chief Appellate Defender

This 7th day of November, 2022.