

RECEIVED

Nov 16 2022

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

---

APPEAL FROM ANDERSON COUNTY  
Court of General Sessions

R. Lawton McIntosh, Judge

---

Unpublished Opinion No. 2021-UP-278 (S.C. Ct. App. Filed July 21, 2021)  
Court of Appeals Appellate Case Number: 2017-002011

---

State of South Carolina,

Respondent,

v.

Jason Franklin Appellant,

Appellant.

APPELLATE CASE NO. 2021-001505

---

**MOTION FOR EXTENSION OF TIME TO FILE  
REPLY TO RESPONDENT'S RESPONSE TO  
APPELLANT'S FINAL BRIEF**

---

Appellant Jason Franklin Carver, through his undersigned counsel, hereby respectfully requests an extension of time to work on and file his Reply to Respondent's Response to Appellant's Final Brief.

1. On October 4, 2022, Appellant filed his Final Brief. It was clocked on October 5, 2022.
2. On October 19, 2022, Appellant filed his Amended Final Brief.
3. On November 7, 2022, Respondent filed its Return to Appellant's Final Brief.
4. Under Rule 242 (g) of the South Carolina Appellate Court Rule (SCACR), Petitioner has ten (10) days from service of Return, or until November 17, 2022, to file his Reply.

5. Due to the complexity of the facts and issues involved in this present case, and the ramifications of failure, Appellant prays for additional time of ten (10) days from November 16, 2022, or until November 28, 2022 (November 26<sup>th</sup> is a Saturday.), to file and submit his Reply.

6. Appellant seeks this extension of time to ensure a thorough reply given this is his last chance to speak regarding the issues before the Court. Additionally, Appellant's counsel is currently working on four appellate cases, and numerous other weighty projects.

7. This request is not sought for delay but so that justice may be done. Appellant prays the lack of resulting prejudice to opposing counsel will allow the Court to grant this Motion.

Respectfully submitted by,

***s/Donald L. Smith***

Donald L. Smith (Bar No.: 6699)

2722 W. Whitner Street

Anderson, SC 29626

Telephone: (864) 642-9284

Facsimile: (864) 642-9285

[attorneydonaldsmith@gmail.com](mailto:attorneydonaldsmith@gmail.com)

*Attorney for Petitioner*

Anderson, South Carolina  
November 16, 2022.