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Dec 07 2022

S.C. SUPREME COURT

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Spartanburg County

Honorable William A. McKinnon, Circuit Court Judge

SAMUEL JETER,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2022-000978

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

Counsel for Samuel Jeremiah Jeter respectfully requests a **final thirty (30) day extension, from December 7, 2022 until January 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 Samuel Jeremiah Jeter 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 filed the Petition for Certiorari to the Court of Appeals in the case of The State v. Amy N. Taylor with both this Court and the Court of Appeals on December 6, 2022. Counsel filed the Petition for Writ of Certiorari and the Appendix in the case of Toaby Alexander Trapp v. The State with this Court on November 18, 2022. Counsel filed the Final Brief of Appellant and Record on Appeal in the case of Michael A. Williams v. The State with the Court of Appeals on November 9, 2022. Counsel filed the Petition for Rehearing in the case of Michael Edward Williams v. The State with the Court of Appeals on November 8, 2022. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Terbias Jerrod Goff with the Court of Appeals on November 7, 2022. 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.


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

5. On November 29, 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 December 31, 2022.

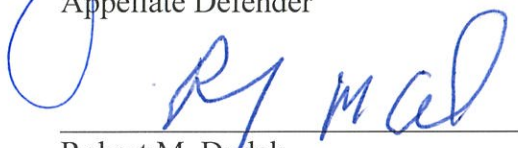
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension from December 7, 2022 until January 6, 2022**, in which to serve and file the Petition for Writ of Certiorari and Appendix in this case based upon the above exigent

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,



Jessica M. Saxon
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 7th day of December, 2022.