

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

Jun 29 2023

APPEAL FROM GREENVILLE COUNTY
Court of General Sessions

SC Court of Appeals

Edward W. Miller, Circuit Court Judge

Appellate Case No. 2023-000945

The State,

Respondent,

v.

Joseph Bernard Jackson,

Appellant.

PETITION FOR AN EXTENSION OF TIME
TO FILE INITIAL BRIEF OF APPELLANT
AND DESIGNATION OF MATTER

Counsel for Appellant respectfully requests and extension of time in which to file the Initial Brief of Appellant and Designation of Matter on Appeal. In support of this request, counsel shows:

1. The Initial Brief of Appellant and Designation of Matter are due to be filed with the Court on July 10, 2023.
2. This is the first request for an extension by counsel for Appellant.
3. This request is based on counsel's trial workload and is being requested in good faith and for good cause without any purpose to delay.
4. Counsel for Respondent has been notified of this request and consents.

WHEREFORE, undersigned counsel for Appellant respectfully requests this Court extend the time for filing the Initial Brief and Designation of Matter to August 9, 2023.

Respectfully submitted,

TURNER PADGET GRAHAM & LANEY, P.A.

s/Christopher D. Scalzo

Christopher D Scalzo (SC Bar No. 70522)

Post Office Box 1509

Greenville, South Carolina 29602

Direct: 864-552-4652

Fax: 864-282-5947

CScalzo@turnerpadget.com

Greenville, South Carolina

June 29, 2023

ATTORNEYS FOR APPELLANT

Other Counsel of Record

M. Kyle Thompson, Esq.

General Counsel

13th Judicial Circuit Solicitor's Office

305 E. North St., Ste 325

Greenville, SC 29601

KyThompson@greenvillecounty.org

ATTORNEY FOR RESPONDENT

William M. Blicht, Jr.

Sr. Asst. Deputy Attorney General

Attorney General's Office

Post Office Box 11549

Columbia, SC 29211

WBlicht@scag.gov

ATTORNEY FOR RESPONDENT

RECEIVED

Jun 29 2023

SC Court of Appeals

PROOF OF SERVICE OF NOTICE OF APPEAL

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of General Sessions

Edward W. Miller, Circuit Court Judge

Case No. 1998-GS-23-04295

The State, Respondent,

v.

Joseph Bernard Jackson, Appellant.

PROOF OF SERVICE

I certify that I have served the Petition for Extension of Time to file Initial Brief and Designation of Matter on the State as respondent by electronic mail to the address in the AIS as follows:

M. Kyle Thompson, Esq.
General Counsel
13th Judicial Circuit Solicitor's Office
305 E. North St., Ste 325
Greenville, SC 29601
KyThompson@greenvillecounty.org
ATTORNEY FOR RESPONDENT

William M. Blitch, Jr.
Sr. Asst. Deputy Attorney General
Attorney General's Office
Post Office Box 11549
Columbia, SC 29211
WBlitch@scag.gov
ATTORNEY FOR RESPONDENT

Respectfully submitted,

TURNER PADGET GRAHAM & LANEY, P.A.

s/Christopher D. Scalzo

Christopher D Scalzo (SC Bar No. 70522)

Post Office Box 1509

Greenville, South Carolina 29602

Direct: 864-552-4652

Fax: 864-282-5947

CScalzo@turnerpadget.com

ATTORNEYS FOR APPELLANT

Greenville, South Carolina
June 29, 2023