ORIGINAL

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Richland County

R. Knox McMahon, Circuit Court Judge

RECEIVED
JUL 08 2013
SC Court of Appeals

THE STATE,

RESPONDENT,

V.

ZINAH DAMARIS JENNINGS,

APPELLANT

APPELLATE CASE NO. 2012-212947

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

The undersigned counsel respectfully requests a **final thirty-day extension, until August 7, 2013** in which to file the initial brief of appellant and designation of matter in the above–referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The initial brief of appellant and designation of matter in this case are due to be served and filed today.

2. Counsel is currently working on a death penalty case in Marion Bowman v. State. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Brenda Bratschi in this Court on Monday, July 1, 2013. On Friday, June 21, 2013, counsel filed the brief of appellant and record on appeal in State v. Stakren Jefferson in this Court. Counsel had an oral

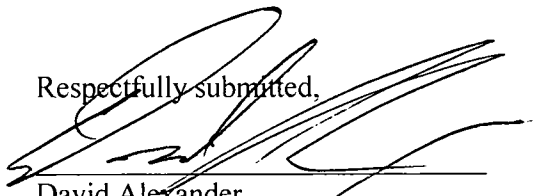
argument in the case of State v. Michael L. Couch in this Court on Thursday, June 13, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Edward Dunn in this Court on Monday, June 10, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Michael D. Williams in this Court on Thursday, June 6, 2013. Also on Thursday, June 6, 2013, counsel filed the petition for writ of certiorari and accompanying appendix in the case of Phillip Keathe Carey v. State in the Supreme Court. Counsel had an oral argument in the case of State v. Timmy Rogers in this Court on Wednesday, June 5, 2013. Counsel had an oral argument in the case of State v. Darren Scott in this Court on Wednesday, May 15, 2013. On Wednesday, May 8, 2013, counsel filed the Brief of Respondent and accompanying appendix with the Supreme Court in State v. Robert Watkins. On Monday, May 6, 2013, counsel filed the Brief of Petitioner with the Supreme Court in Richard Sims v. State. Counsel had an oral argument in the case of State v. James Miller in the Supreme Court on Thursday, May 2, 2013.

3. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

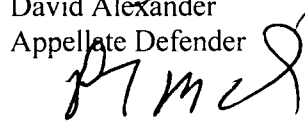
4. As indicated by his consent below, counsel for the state graciously consents to or does not oppose this request.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty-day extension, until August 7, 2013**. Counsel respectfully requests that the time limits for filing the initial brief of appellant and designation of matter be held in abeyance pending a ruling on this motion.

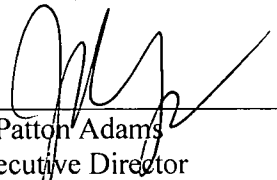
Respectfully submitted,



David Alexander
Appellate Defender



Robert M. Dudek
Chief Appellate Defender



T. Patton Adams
Executive Director
J. Hugh Ryan, III
General Counsel

July 8, 2013

I do not oppose:

Salley W. Elliott, Esquire