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Jul 31 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of General Sessions

Edward W. Miller, Circuit Court Judge

Appellate Case No. 2023-000945

The State,

Respondent,

v.

Joseph Bernard Jackson,

Appellant.

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

Counsel for Appellant respectfully requests a second 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 were originally due to be filed with the Court on July 10, 2023.
2. On June 29, 2023, counsel for Appellant moved for an extension which was granted on July 5, 2023 extending the time to August 9, 2023.
3. While the motion as pending, counsel was noticed for a jury trial in matter 2020-CP-39-00919 for August 14, 2023, and is currently the first case up for trial.
4. 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.

5. 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 September 11, 2023.

Respectfully submitted,

TURNER PADGET GRAHAM & LANEY, P.A.

s/Christopher D. Scalzo

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Greenville, South Carolina

July 31, 2023

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ATTORNEY FOR RESPONDENT

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PROOF OF SERVICE

I certify that I have served the Petition for Second 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:

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Respectfully submitted,

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ATTORNEYS FOR APPELLANT

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