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Mar 04 2024

SC Court of Appeals

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Newberry County

Frank R. Addy, Circuit Court Judge

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THE STATE,

APPELLANT,

V.

JONATHAN CONARD DAWKINS,

RESPONDENT.

APPELLATE CASE NO. 2023-000274

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MOTION FOR AN EXTENSION OF TIME TO  
SERVE AND FILE THE INITIAL BRIEF OF RESPONDENT  
AND DESIGNATION OF MATTER

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Counsel for appellant respectfully requests a **fourth and final thirty (30) day extension from March 4, 2024, until April 3, 2024**, in which to serve and file the Initial Brief of Appellant and Designation of Matter in the above-referenced case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. This is a fourth request for an extension. In support of this request, counsel shows:

1. The Initial Brief of Respondent and Designation of Matter in this case are due to be served and filed today.
2. Counsel for appellant respectfully submits that extraordinary circumstances exist

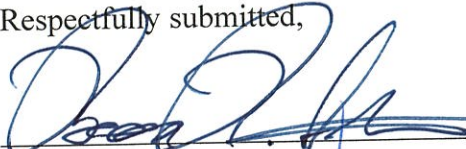
which warrant the granting of an additional extension of time. Given the number of extensions previously granted and the order in which counsel attempts to manage his caseload, counsel hopes that no further extension requests will be required.

3. Counsel will file the initial brief of appellant and designation of matter in the case of State v. Bradley Walker with the Court of Appeals today, March 4, 2024. Counsel represented petitioner in a PCR reconstruction hearing in the case of Jacoby Fields v. State via WebEx hearing on February 26, 2024. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Nathaniel Hambleton v. State with the Supreme Court on February 22, 2024. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Frederick Jones v. State with the Supreme Court on February 12, 2024. Counsel represented petitioner in a PCR reconstruction hearing in the case of Jacoby Fields v. State via WebEx hearing on February 6, 2024. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Antone B. Ellis Tremayne Blakely with the Court of Appeals on February 5, 2024. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of David Welch v. State with the Supreme Court on January 26, 2024. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Devante Lamont White with the Court of Appeals on January 16, 2024. Counsel filed the Anders brief of appellant and record on appeal in the case of State v. Christopher Shumpert with the Court of Appeals on January 16, 2024.

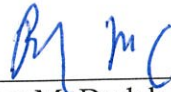
4. On February 28, 2024, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through March 31, 2024.

WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension from March 4, 2024, until April 3, 2024** in which to serve and file the Initial Brief of Appellant and Designation of Matter in this case based upon the above exigent circumstances.

Respectfully submitted,



Breen R. Stevens  
Appellate Defender



Robert M. Dudek  
Chief Appellate Defender



J. Hugh Ryan, III  
Executive Director/  
Hervey B. O. Young  
Deputy Director and General Counsel/  
W. Lawrence Brown  
Deputy General Counsel and Training Director

This 4th day of March, 2024.

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APPELLATE CASE NO. 2023-000274  
\_\_\_\_\_

CERTIFICATE OF SERVICE  
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Pursuant to Rule 262(a)(3) and Rule 262(c)(3), SCACR, the undersigned hereby certifies a true copy of the Motion for Extension in the above-referenced case has been served upon Ambree M. Muller, Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), this 4th day of March, 2024.



\_\_\_\_\_  
Breen R. Stevens  
Appellate Defender

ATTORNEY FOR RESPONDENT

**From:** [Leverett, Scott](#)  
**To:** [SC - MULLER AMBREE](#)  
**Cc:** [Grace Sommer](#); [Stevens, Breen](#)  
**Subject:** Jonathan Conard Dawkins - Extension 4 - Appellate Case No. 2023-000274  
**Date:** Monday, March 4, 2024 1:59:00 PM  
**Attachments:** [Jonathan Conard Dawkins - Extension 4 - Appellate Case No. 2023-000274.pdf](#)

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Dear Ms. Muller,

Attached please find a copy of the fourth Extension in the above referenced case that is being filed today with the Court of Appeals. The wrong attachment was inadvertently send with the previous email. Please disregard it.

-Scott Leverett  
Admin. Asst. for Breen Stevens  
Appellate Defense