

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

---

Certiorari to Dorchester County

Honorable R. Kirk Griffin, Circuit Court Judge

---

JABARI MOORE,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2023-001724

---

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

---

Counsel for Jabari Moore respectfully requests a final thirty (30) day extension, from March 13, 2024, until April 12, 2024, 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 Jabari Moore respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of

**RECEIVED**  
**Mar 13 2024**  
S.C. SUPREME COURT

extensions previously granted and the order in which counsel attempts to manage her caseload, counsel hopes that no further extension requests will be required.

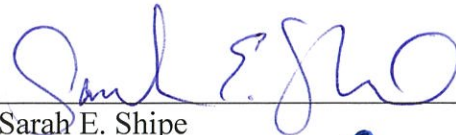
3. Counsel filed the Johnson Petition for Writ of Certiorari and Appendix in the case of Timothy C. Turbeville v. State with the Supreme Court on February 23, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Charles E. Price with the Court of Appeals on February 23, 2024. Counsel filed the Anders Brief of Appellant, Designation of Matter, and Record on Appeal in the case of The State v. Robert A. Carter with the Court of Appeals on February 9, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Christopher A. Comer with the Court of Appeals on February 1, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. TyChristian Ladson with the Court of Appeals on January 31, 2024.

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

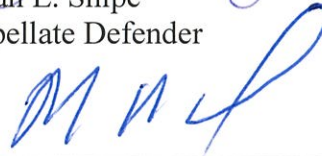
5. On February 28, 2024, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through March 31, 2024.

WHEREFORE, the undersigned counsel would respectfully request a final thirty (30) day extension from March 13, 2024, until April 12, 2024, 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,



Sarah E. Shipe  
Appellate Defender



Robert M. Dudek  
Chief Appellate Defender

This 13th day of March, 2024.