

**RECEIVED**

**Mar 18 2024**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

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Appeal from Colleton County

Carmen T. Mullen, Circuit Court Judge

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THE STATE,

RESPONDENT,

V.

BRADLEY LAMONT JACKSON,

APPELLANT

APPELLATE CASE NO. 2023-001090

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

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Counsel for Bradley Lamont Jackson respectfully requests a thirty (30) day extension from March 18, 2024 until April 17, 2024, in which to serve and file the Initial Brief of Appellant and Designation of Matter 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 Initial Brief of Appellant and Designation of Matter in this case are due to be served and filed today.
2. Counsel filed the Reply to Return to Petition for Writ of Certiorari in the case of

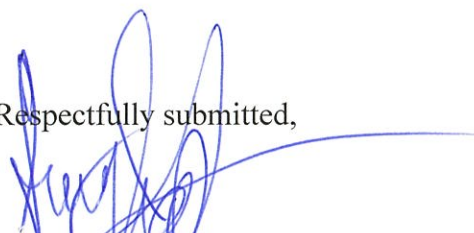
Marc Anthony Palmer v. The State with the Supreme Court on March 14, 2024. Counsel filed the Return to Motion to Remand in the case of In the Matter of the Care and Treatment of Jeremiah James Pough with this Court on March 7, 2024. Counsel filed the Brief of Appellant and Record on Appeal in the case of The State v. Kenneth E. Parker with this Court on February 28, 2024. Counsel filed the Initial Reply Brief of Appellant in the case of The State v. Justin Tyler Ellaree Hopkins with this Court on February 20, 2024. Counsel filed the Petition for Writ of Certiorari to the Court of Appeals in the case of The State v. Carnie Norris with the Supreme Court on February 16, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Martin Dixon with this Court on February 15, 2024. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Trenton M. Barnes v. The State with the Supreme Court on February 15, 2024. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Lee Dell Bradley v. The State with the Supreme Court on February 8, 2024. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Levy Larkin Brown v. The State with the Supreme Court on January 26, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Driscoll Riggins, Jr. with this Court on January 25, 2024. Counsel filed the Petition for Writ of Certiorari and the Appendix in the case of Jody Thompson v. The State with the Supreme Court on January 16, 2024.

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. On February 28, 2024, opposing counsel, the Office of the Attorney General, 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.

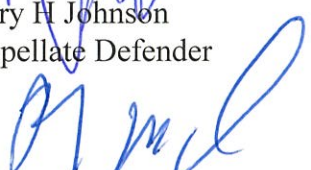
WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension from March 18 2024 until April 17, 2024. Counsel respectfully requests that the time limits for filing the Initial Brief of Appellant and Designation of Matter be held in abeyance pending a ruling on this motion.

Respectfully submitted,



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Gary H Johnson  
Appellate Defender



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Robert M. Dudek  
Chief Appellate Defender

This 18th day of March, 2024.

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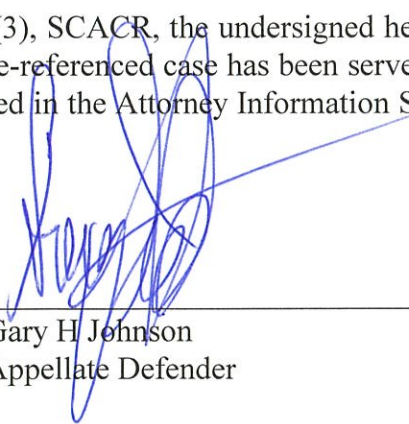
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CERTIFICATE OF SERVICE

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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 Mark Farthing, Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), this 18th day of March, 2024.



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Gary H. Johnson  
Appellate Defender

ATTORNEY FOR APPELLANT

**From:** [Warren, Kaylynn](#)  
**To:** [Mark Farthing](#)  
**Cc:** [Johnson, Gary](#); [Caroline Collins](#)  
**Subject:** 2023-001090 The State v. Bradley Lamont Jackson  
**Date:** Monday, March 18, 2024 8:56:00 AM  
**Attachments:** [2023-001090 The State v. Bradley Lamont Jackson Third Motion for Extension and COS.pdf](#)

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Good Morning,

Attached for service in the above-referenced case is the Third Motion for Extension which will be filed today, March 18, 2024, with the Court of Appeals via email filing.

Respectfully,

Kaylynn

**Kaylynn Warren**

Administrative Assistant

South Carolina Commission on Indigent Defense

Division of Appellate Defense

(803) 734-1330