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Mar 27 2024

SC Court of Appeals

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Jasper County

Robert J. Bonds, Circuit Court Judge

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THE STATE,

RESPONDENT,

V.

JHARAUN WASHINGTON,

APPELLANT

APPELLATE CASE NO. 2023-000468

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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 Jharaun Washington respectfully requests a **fourth and final thirty (30) day extension from March 27, 2024 until April 26, 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 Appellant and Designation of Matter in this case are due to be served and filed with the Court today.
2. Counsel for Jharaun Washington 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 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 Anders 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.


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

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.

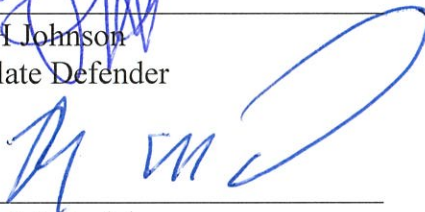
WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension from March 27, 2024 until April 26, 2024**, in which to serve and file the Initial Brief of Appellant and Designation of Matter in this case based upon the above exigent circumstances.

Respectfully submitted,




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Gary H. Johnson  
Appellate Defender



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Robert M. Dudek  
Chief Appellate Defender



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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 27th day of March, 2024.

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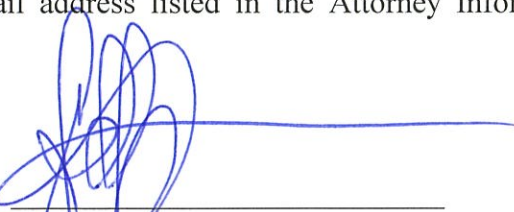
APPELLATE CASE NO. 2023-000468

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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 Melody J. Brown, Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), this 27th day of March, 2024.



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Gary H. Johnson  
Appellate Defender

ATTORNEY FOR APPELLANT

**From:** [Warren, Kaylynn](#)  
**To:** [SC - BROWN MELODY](#)  
**Cc:** [Johnson, Gary](#); [Angela Brown](#)  
**Subject:** 2023-000468 The State v. Jharaun Washington  
**Date:** Wednesday, March 27, 2024 9:24:00 AM  
**Attachments:** [2023-000468 The State v. Jharaun Washington Fourth Motion for Extension and COS.pdf](#)

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Good Morning,

Attached for service in the above-referenced case is the Fourth Motion for Extension which will be filed today, March 27, 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