

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

RECEIVED

May 17 2024

S.C. SUPREME COURT

Certiorari to Calhoun County

Honorable R. Kirk Griffin, Circuit Court Judge

JERRY MCKNIGHT,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2023-001809

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

Counsel for Jerry McKnight respectfully requests a **final thirty (30) day extension from May 17, 2024, until June 17, 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 Jerry McKnight 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 her caseload, counsel hopes that no further extension requests will be required.

3. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Aneisha Young v. State with the Supreme Court on April 29, 2024. Counsel filed the Johnson Petition for Writ of Certiorari and Appendix in the case of Malcom Williams v. State with the Supreme Court on April 23, 2024. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Jabari Moore v. State with the Supreme Court on April 11, 2024. Counsel filed the Petition for Writ of Certiorari, Brief of Appellant Pursuant to White v. State, and Appendix in the case of Robert Lee Reddock v. State with the Supreme Court on March 27, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Samuel T. Riser with the Court of Appeals on March 19, 2024. 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.

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

5. On April 30, 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 May 31, 2024.

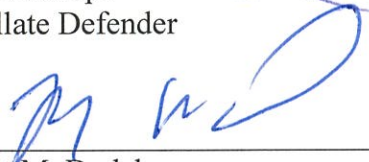
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension from May 17, 2024, until June 17, 2024**, in which to serve and file the Petition for Writ of Certiorari and Appendix in this case based upon the above exigent circumstances. Counsel requests that time limits 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 17th day of May, 2024.