

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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S.C. SUPREME COURT

Certiorari to Lexington County

Honorable Jocelyn J. Newman, Circuit Court Judge

JONATHAN CHRISTIAN HUGHES,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2024-000231

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

Counsel for Jonathan Christian Hughes respectfully requests an extension of thirty (30) days from July 1, 2024 until July 31, 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 second 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 Jonathan Christian Hughes 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 Return to the Petition for Writ of Certiorari in the case of Erick E. Wells v. State with the Supreme Court on June 21, 2024. Counsel filed the Brief of Petitioner in the case of DeAngelo Brown v. State with the Court of Appeals on June 20, 2024. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Ben Robert Stewart v. State with the Supreme Court on June 3, 2024. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Jerry McKnight v. State with the Supreme Court on May 29, 2024.

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

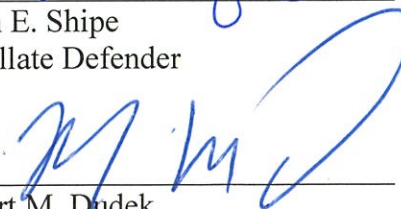
5. On June 26, 2024, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through July 31, 2024.

WHEREFORE, the undersigned counsel would respectfully request a thirty (30) day extension from July 1, 2024 until July 31, 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 serving and 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 1st day of July, 2024.