

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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Certiorari to Allendale County

Honorable Roger M. Young, Circuit Court Judge

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JAYCOBY TERREAK WILLIAMS,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2024-000007

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

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Counsel for Jaycoby Terreak Williams respectfully requests a **final thirty (30) day extension, from July 17, 2024 until August 16, 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 Jaycoby Terreak Williams respectfully submits that extraordinary

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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, the Brief of Appellant Pursuant to *White v. State*, and the Appendix in the case of Gerald Akeem Gadsden v. The State with this Court on July 8, 2024. Counsel filed the Brief of Petitioner in the case of Maurice Roberts v. The State with the Court of Appeals on June 27, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Morgan Dayle Carr with the Court of Appeals on June 21, 2024. Counsel filed the Petition for Writ of Certiorari to the Court of Appeals in the case of Brittney C. Foster v. The State with this Court on June 3, 2024. Counsel filed the Petition for Writ of Certiorari and the Appendix in the case of Montre D. Brown v. The State with this Court on May 31, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Marcus D. Batson with the Court of Appeals on May 22, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Antonio Long with the Court of Appeals on May 17, 2024. Counsel filed the Return to Petition for Writ of Certiorari in the case of Storm R. B. McCarthy v. The State with this Court on May 14, 2024. Counsel filed the Memorandum Addressing S.C. Code § 23-3-436 in the case of In the Interest of Khalid J., A Juvenile Under the Age of Seventeen with the Court of Appeals on May 9, 2024. Counsel appeared for Oral Argument in the case of Michael Christian Barclay v. The State before the Court of Appeals on May 8, 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 **final thirty (30) day extension from July 17, 2024 until August 16, 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,

  
Joanna K. Delany  
Appellate Defender

  
Robert M. Dudek  
Chief Appellate Defender

This 17th day of July, 2024.