

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Newberry County

Honorable B. Alex Hyman, Circuit Court Judge

MATTHEW L. JACKSON,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2024-000923

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

Counsel for Matthew L. Jackson respectfully requests an extension of thirty (30) days from October 10, 2024, until November 12, 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 Matthew L. Jackson respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the

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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 Brief of Appellant and the Record on Appeal in the case of The State v. Kweisi Nicks with the Court of Appeals on October 4, 2024. Counsel appeared for Oral Argument in the case of The State v. Bradley Corlew before the Court of Appeals on September 24, 2024. Counsel filed the Anders Brief of Appellant and Record on Appeal in the case of The State v. Kadidas R. Gossett with the Court of Appeals on September 17, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Tony T. Sweet with the Court of Appeals on September 11, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Rodney Nesmith with the Court of Appeals on September 4, 2024. Counsel represented the appellant at his reconstruction hearing in The State v. Michael D. Williams before the circuit court on September 2, 2024.

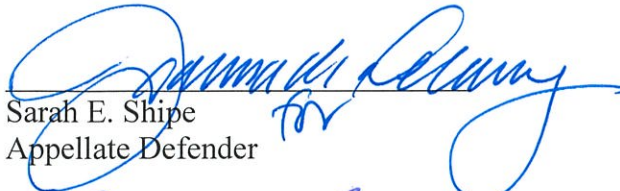
4. Counsel makes this request in good faith and not for purpose of delay.

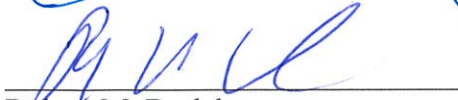
5. On September 29, 2024, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through October 31, 2024.

WHEREFORE, the undersigned counsel would respectfully request a thirty (30) day extension from October 10, 2024, until November 12, 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.

[signature page to follow]

Respectfully submitted,


Sarah E. Shipe
Appellate Defender


Robert M. Dudek
Chief Appellate Defender

This 10th day of October, 2024.