

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Allendale County

Honorable Roger M. Young, Circuit Court Judge

BOBBY JONES, SR.,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2024-000633

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

Counsel for Bobby Jones, Sr. respectfully requests an extension of thirty (30) days from October 23, 2024, until November 22, 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 Bobby Jones, Sr. respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of

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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 Brief of Appellant and Supplemental Record on Appeal in the case of The State v. Arkevus Jimon Cauthen with the Court of Appeals on October 21, 2024. From October 14-16, 2024, Counsel attended the annual Public Defender's Conference in Myrtle Beach. Counsel filed the Petition for Writ of Certiorari in the case of De'Andre Murphy v. The State with the Supreme Court on October 15, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. William McKinney with the Court of Appeals on October 10, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Desmond Lamar Green with the Court of Appeals on October 10, 2024. Counsel filed the Petition for Writ of Certiorari to the Court of Appeals in the case of In the Matter of the Care and Treatment of James Gregory Younger with the Supreme Court on October 9, 2024. Counsel filed the Brief of Appellant and Designation of Matter in the case of The State v. Stacy Michelle Rabon with the Court of Appeals on September 30, 2024. Counsel filed the Anders Brief of Appellant in the case of In the Matter of the Care and Treatment of Walter Vaughn with the Court of Appeals on September 11, 2024. Counsel filed the Anders Brief of Appellant in the case of The State v. William Rivers with the Court of Appeals on September 11, 2024. Counsel filed the Brief of Appellant and Designation of Matter in the case of The State v. Dameun Sanders with the Court of Appeals on August 27, 2024.

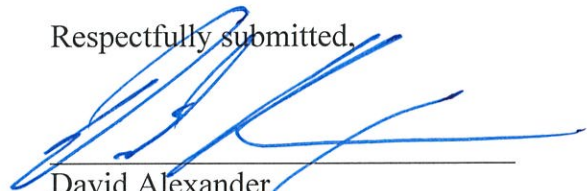
4. Counsel makes this request in good faith and not for purpose of delay.

5. On September 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 October

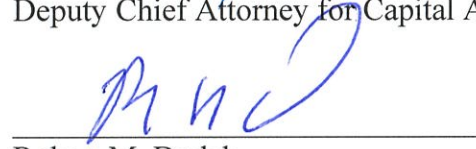
31, 2024.

WHEREFORE, the undersigned counsel would respectfully request a thirty (30) day extension from October 9, 2024, until November 8, 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,



David Alexander
Deputy Chief Attorney for Capital Appeals



Robert M. Dudek
Chief Appellate Defender

This 23rd day of October, 2024.