

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Charleston County

Honorable Kristi F. Curtis, Circuit Court Judge

JALANN WILLIAMS,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2024-000967

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

Counsel for Jalann Williams respectfully requests a **final thirty (30) day extension, from October 25, 2024 until November 25, 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 Jalann Williams respectfully submits that extraordinary circumstances

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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 his caseload, counsel hopes that no further extension requests will be required.

3. Counsel just finished writing the brief in the murder case of The State v. Dionicio Nava Abarca, which contains a novel issue of law, and will file it well before the November 6, 2024 deadline. Counsel filed the Petition for Writ of Certiorari and the Appendix in the case of Gary Moore v. The State with this Court on Friday, October 18, 2024. Counsel presented the Case Law Update session of the South Carolina Public Defender Conference which he attended from October 14-16, 2024 in Myrtle Beach, South Carolina. **Counsel has been battling illness since that time while continuing to work on his cases.** Counsel filed the Brief of Appellant and Record on Appeal in the case of The State v. Zachary Deon McClain with the Court of Appeals on October 4, 2024. Counsel filed the Brief of Appellant and Record on Appeal in the case of The State v. Christopher Chad Duncan with the Court of Appeals on October 1, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. James J. Patterson, III with the Court of Appeals on September 16, 2024. On September 16, 2024, counsel and co-counsel Lara Caudy also filed a Motion to Strike the Petition for Rehearing and Rehearing *en banc* in State v. Kierin Dennis with the Court of Appeals. Counsel appeared for Oral Argument in the cases of The State v. Bowen Gray Turner (In re: Victim C.B., Appellant.) (2022-000472) and The State v. Bowen Gray Turner (2022-001018) before the Court of Appeals on September 10, 2024. Counsel filed the Petition for Writ of Certiorari and the Appendix in the case of Eddie L. Bass, III v. The State with this Court on September 6, 2024. Counsel filed the Return to Motion to Supplement the Record on Appeal in the case of The State v. Anthony

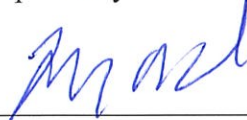
Nicholas Argoe with the Court of Appeals on August 30, 2024. Counsel filed the Brief of Appellant and Record on Appeal in the case of The State v. Terry Donial Woods, Jr. with the Court of Appeals on August 28, 2024. Counsel filed the Brief of Appellant and Record on Appeal in the case of The State v. Aaron Sincere Hood with the Court of Appeals on August 12, 2024. **Counsel also has extensive administrative duties as the Chief Appellate Defender, including carrying a full caseload.**

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 **final thirty (30) day extension from October 25, 2024 until November 25, 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,



Robert M. Dudek
Chief Appellate Defender

This 25th day of October, 2024.