

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Charleston County

Honorable R. Kirk Griffin, Circuit Court Judge

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JAKE ANTONIO WILSON,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2024-000498

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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 Jake Antonio Wilson respectfully requests a **fourth and final seven (7) day extension, from November 1, 2024, until November 8, 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 fourth 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 Jake Antonio Wilson respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. **Counsel attended in person the PCR hearing for Tyshun Bessilieu held in Georgetown on October**

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**28, 2024. Counsel also had an oral argument in State v. Rashawn Vertez Carter before the Supreme Court on October 30, 2024.**

3. Counsel makes this request in good faith and not for purpose of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

4. 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.

5. On October 30, 2024, opposing counsel, the Attorney General's Office, graciously consented to this extension by way of general consent granted in writing, by Deputy Attorney

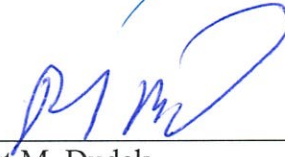
General Donald J. Zelenka for all Appellate Defense extensions through November 30, 2024.

WHEREFORE, the undersigned counsel would respectfully request a **final seven (7) day extension, from November 1, 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 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



J. Hugh Ryan, III  
Executive Director/  
Hervey B. O. Young  
Deputy Director and General Counsel/  
W. Lawrence Brown  
Deputy General Counsel and Training Director

This 1<sup>st</sup> day of November, 2024.