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Nov 13 2024

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In the Supreme Court

Appeal from Greenville County
The Honorable R. Scott Sprouse, Circuit Court Judge

Appellate Case No. 2024-000090

David Quintan Jones, #00391227,

Petitioner,

vs.

State of South Carolina,

Respondent.

**MOTION FOR FOURTH EXTENSION OF TIME TO FILE THE
RETURN TO PETITION FOR WRIT OF CERTIORARI**

The undersigned counsel would respectfully request a FOURTH thirty (30) day extension in which to file the Return to Petition for Writ of Certiorari in the above-referenced case. Counsel for Appellant has graciously consented to this extension request. In support of this motion, counsel would respectfully show the Court the following circumstances:

Respondent's Return to Petition for Writ of Certiorari is due to be filed tomorrow, Thursday, November 14, 2024. The undersigned attorney has had a number of state, and federal matters to attend to since October 11, 2024, specifically:

1. Counsel filed the Initial Brief of Respondent in the matter of The State vs. Antone Blakely, Appellate Case No. 2023-000721, a Laurens County murder appeal matter now pending in the South Carolina Court of Appeals on October 21, 2024;

2. Counsel prepared and filed the Return to Petition for Writ of Certiorari in the matter of The State vs. Royal D. Williams, III, Appellate Case No.2024-000838, a Florence County direct appeal matter now pending before the South Carolina Supreme Court on October 30, 2024;

3. Counsel filed the Return and Memorandum of Law in the matter of Matthew C. Dwyer vs. Warden of Broad River Correctional Institution, C/A No. 5:24-cv-3036-SAL-KDW on October 24, 2024;

4. Counsel filed the Respondent's Response in Opposition to Petitioner's Motion for Leave to File [ECF #77] in the matter of Earnest Vaughn vs. Warden Turbeville Correctional Institution, C/A No. 6:23-04220-JDA on October 29, 2024;

5. Counsel also filed the Respondent's Response to Motion to Compel [ECF #24] in the matter of Arthur Quintin Jones, Jr. vs. Warden Evans Correctional Institution, C/A No. 6:24-04191-JFA-KFM on November 1, 2024;

6. Counsel filed the Respondent's Reply to Objections to Report and Recommendation [ECF #34] in the matter of David Andrew Bowers vs. Warden William Langdon, III, C/A No. 0:24-287-JD-PJG on November 4, 2024;

7. Counsel appeared for oral argument in the matter of The State vs. Andre Covington, Jr., Appellate Case No. 2022-000831, a Chesterfield County murder appeal now pending before the South Carolina Court of Appeals on Tuesday, November 5, 2024;

8. Counsel filed the Respondent's Response in Opposition to Petitioner's Motions [ECF #s 25 & 26] in the matter of Arthur Quintin Jones, Jr. vs. Warden Evans Correctional Institution, C/A No. 6:24-04191-JFA-KFM on November 12, 2024;

9. Counsel is currently preparing the Return and Memorandum of Law in Support of Motion for Summary Judgment in the matter of Kevin C. Casey vs. Warden of Tyger River, C/A No. 9:24-03653-JFA-MHC; and

10. Counsel has been involved in working **on other matters in state and federal court.**

WHEREFORE, for the following circumstances, counsel respectfully requests a FOURTH thirty (30) day extension of time to serve and file the Return to Petition for Writ of Certiorari. This request is made in good faith, and not for the purposes of delay. This extension will make Respondent's Return due on December 16, 2024.

Respectfully Submitted,

ALAN WILSON
Attorney General

DONALD J. ZELENKA
Deputy Attorney General

MELODY J. BROWN
Senior Assistant Deputy Attorney General

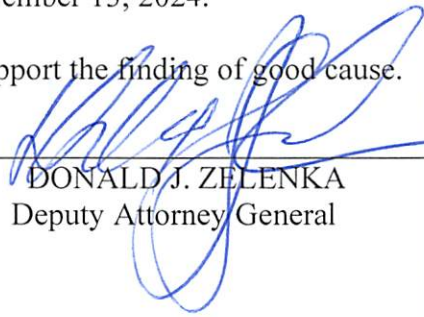
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ATTORNEYS FOR RESPONDENT

November 13, 2024.

I support the finding of good cause.

By: 
DONALD J. ZELENKA
Deputy Attorney General