

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

RECEIVED

Nov 22 2024

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Certiorari to Allendale County

S.C. SUPREME COURT

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 TO SERVE AND FILE  
THE PETITION FOR WRIT OF CERTIORARI  
AND APPENDIX  
\_\_\_\_\_

Counsel for Bobby Jones, Sr. respectfully requests a **final thirty (30) day extension, from November 22, 2024, until December 23, 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 Bobby Jones, Sr. respectfully submits that extraordinary circumstances 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 filed the Brief in the case of The State v. Towodi Tecumseh Shequoyah with the Court of Appeals on November 18, 2024. Counsel filed the Petition for Writ of Certiorari in the case of Jake Antonio Wilson v. The State with the Supreme Court on November 7, 2024. Counsel had an oral argument in State v. Rashawn Vertez Carter before the Supreme Court on October 30, 2024. Counsel attended in person the PCR hearing for Tyshun Bessilieu held in Georgetown on October 28, 2024. 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.

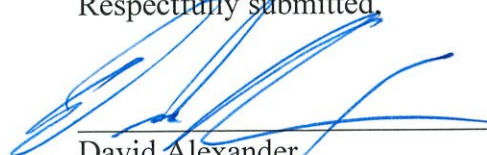
4. Counsel makes this request in good faith and not for purpose of delay.

5. On October 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 November 30,

2024.

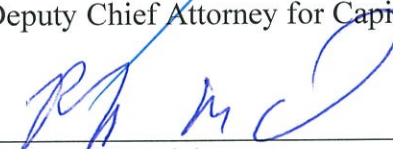
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension from November 22, 2024, until December 23, 2024**, in which to serve and file the Petition for Writ of Certiorari and Appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the Petition for Writ of Certiorari and Appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



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David Alexander  
Deputy Chief Attorney for Capital Appeals



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Robert M. Dudek  
Chief Appellate Defender

This 22<sup>nd</sup> day of November, 2024.