

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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Dec 09 2024

S.C. SUPREME COURT

Certiorari to Anderson County

Honorable Perry H. Gravely, Circuit Court Judge

JACOB NATHANIEL LANCE,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2024-001225

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

Counsel for Jacob Nathaniel Lance respectfully requests an extension of thirty (30) days in which to file the petition for writ of certiorari and accompanying 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 Jacob Nathaniel Lance 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 had an oral argument in the case of Johnny Haggins v. The State before the Court of Appeals on December 4, 2024. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Thomas Eric McDowell with the Court of Appeals on November 25, 2024. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Daniel Jamaal Lawrence v. The State with the Supreme Court on November 13, 2024. Counsel filed the brief of appellant pursuant to White v. State in the case of Daniel Jamaal Lawrence v. The State with the Supreme Court on November 13, 2024. Counsel had an oral argument in the case of The State v. Andre Junior Covington before the Court of Appeals on November 5, 2024. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Norman Philip Browne with the Court of Appeals on October 11, 2024.

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

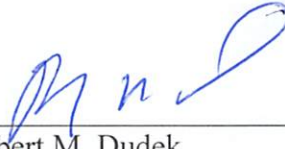
5. Opposing counsel, the Attorney General's Office, has graciously consented to this extension request by way of the thirty-day general consent granted by email from Deputy Attorney General Donald J. Zelenka dated November 27, 2024 for all Appellate Defense extensions through December 31, 2024.

WHEREFORE, the undersigned counsel would respectfully request a thirty (30) day extension 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,



Jordan Wayburn
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 9th day of December, 2024.