

RECEIVED

Dec 12 2024

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Lexington County
Honorable Debra R. McCaslin, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

JAYLEN S. WILSON,

APPELLANT

APPELLATE CASE NO. 2023-001555

MOTION FOR AN EXTENSION OF TIME TO
SERVE AND FILE THE INITIAL BRIEF OF APPELLANT
AND DESIGNATION OF MATTER

Counsel for Jaylen S. Wilson, respectfully requests a **fourth and final thirty (30) day extension from December 12, 2024, until January 13, 2025**, in which to serve and file the initial brief of appellant and designation of matter in the above-referenced case. This is a fourth request for an extension. In support of this request, counsel shows:

1. The initial brief of appellant and designation of matter in this case are due to be served and filed with the Court on December 12, 2024.
2. Counsel for Jaylen S. Wilson respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time.
3. Counsel filed the *Johnson* Petition for Writ of Certiorari and the Appendix in the case of Jontez M. Ward v. The State with the Supreme Court on December 11, 2024. Counsel filed


the Initial Brief of Appellant and Designation of Matter in the case of The State v. Michael J. Smith with the Court of Appeals on December 9, 2024. Counsel filed the Petition for Writ of Certiorari, the Brief of Petitioner Pursuant to *White v. State*, and the Appendix in the case of Matthew L. Jackson v. The State with the Supreme Court on December 3, 2024. Counsel filed the *Johnson* Petition for Writ of Certiorari and the Appendix in the case of Dante Zachius Wheeler v. The State with the Supreme Court on November 20, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Steve Lester with the Court of Appeals on November 20, 2024. Counsel filed the Reply to Return to Petition for Writ of Certiorari in the case of Ben Robert Stewart v. The State with the Supreme Court on November 14, 2024. Counsel filed the Petition for Rehearing in the case of Brian Foster v. The State with the Court of Appeals on November 14, 2024. Counsel filed the Return to Petition for Writ of Certiorari to the Court of Appeals in the case of In the Matter of the Care and Treatment of James L. Williford with the Supreme Court on November 5, 2024. Counsel filed the *Anders* Brief of Appellant and the Record on Appeal in the case of The State v. Felicia Danielle Turnage with the Court of Appeals on November 1, 2024. Counsel filed the *Anders* Brief of Appellant and the Record on Appeal in the case of The State v. Vincent Dwight with the Court of Appeals on October 30, 2024. Counsel filed the Petition for Writ of Certiorari and the Appendix in the case of Wayne Hankinson v. The State with the Supreme Court on October 28, 2024. Counsel filed the Motion to Hold Appeal in Abeyance Pending Receipt of Transcript in the case of The State v. Tashan Antoine Carson with the Court of Appeals on October 28, 2024. Counsel attended the annual South Carolina Public Defender Conference from October 14-16, 2024.

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

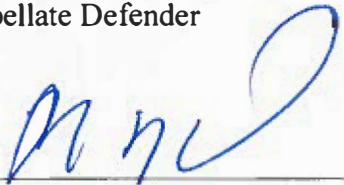
5. On November 27, 2024, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through December 31, 2024.

WHEREFORE, the undersigned counsel respectfully requests a **fourth and final thirty (30) day extension from December 12, 2024, until January 13, 2025**, in which to serve and file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances. Counsel respectfully requests that the time limits for filing the initial brief of appellant and designation of matter be held in abeyance pending a ruling on this motion.

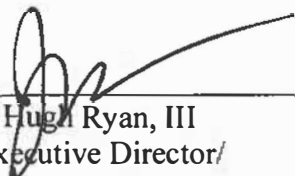
Respectfully submitted,



Sarah E. Shipe
Appellate Defender



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 12th day of December, 2024.

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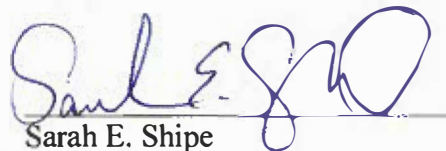
JAYLEN S. WILSON,

APPELLANT

APPELLATE CASE NO. 2023-001555

CERTIFICATE OF SERVICE

Pursuant to Rule 262(a)(3) and Rule 262(c)(3), SCACR, the undersigned hereby certifies a true copy of the motion for extension of time to serve and file the initial brief of appellant and designation of matter in the above-referenced case has been served upon Melody J. Brown, Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), this 12th day of December, 2024.



Sarah E. Shipe
Appellate Defender

ATTORNEY FOR APPELLANT

From: [Stock, Chris](#)
To: [SC - BROWN MELODY; Angela Brown](#)
Cc: [Shipe, Sarah; Warren, Kaylynn](#)
Subject: 2023-001555 - Jaylen S. Wilson - 4th Extension for Brief and Designation
Date: Thursday, December 12, 2024 11:10:00 AM
Attachments: [2023-001555 - Jaylen S. Wilson - 4th Extension for Brief and Designation.pdf](#)

Ms. Brown,

Please find attached for service the 4th Request for Extension for Initial Brief of Appellant and Designation of Matter for Jaylen S. Wilson's appeal which will be filed today with the Court of Appeals.

Thank you.
Chris

Chris Stock
Administrative Assistant
Commission on Indigent Defense
Appellate Division
(803) 734-1330