

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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Dec 16 2024

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas  
Grace Gilchrist Knie, Circuit Court Judge

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S.C. SUPREME COURT

Appellate Case No. 2024-000848

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Jacoby Jamar Gregory,.....Petitioner,

v.

State of South Carolina,.....Respondent.

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**Motion to Extend Time**

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Jacoby Gregory moves this Court for an order extending the time to file the petition for writ of certiorari and appendix, by thirty days, to Wednesday, January 15, 2024. This pleading is the third request for an extension. This motion is based on undersigned counsel's other professional obligations and is not intended for delay. Counsel is a sole practitioner with a statewide trial, appellate, and post-conviction practice. In addition to multiple court appearances in multiple counties, counsel has been working on other appellate obligations. In *State v. Dent*, Appellate Case No. 2024-000355, pursuant to this Court's expedited procedure for appeals from the Court of Appeals, counsel filed the Brief of Petitioner on December 2, 2024 and the Reply Brief of Petitioner December 16, 2024. On December 16, 2024, Counsel filed the Record on Appeal in *State v. Lee*, Appellate Case No. 2023-001843. Counsel is working on the final briefs in *State v. Lee* and a petition for a writ of certiorari in *Stafford v. State*, Appellate Case No. 2024-000979.

Between December 23, 2024 and January 3, 2025, counsel plans to devote significant time to this pleading in order to complete the petition for writ of certiorari without need for additional extensions.

By s/E. Charles Grose, Jr.

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December 16, 2024  
Greenwood, South Carolina