

THE STATE OF SOUTH CAROLINA
In The Supreme Court

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Jan 16 2025

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

S.C. SUPREME COURT

Appellate Case No. 2024-000848

Jacoby Jamar Gregory,.....Petitioner,

v.

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

Motion to Extend Time

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, Friday, 14, 2024. 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-convection practice. In addition to multiple court appearances in multiple counties, counsel has been working on other appellate and trial court pleadings including: an Initial Reply Brief of Appellant on January 13, 2025, in *State v. Hudson*, Appellate Case No. 2024-000439 and a Post-Evidentiary Reply Brief on January 15, 2025, in *Blackwell v. State*, Case No. 2018-CP-432-00928, a capital PCR case. Counsel is working on an Initial Brief of Appellant in *State v. Bishop*, Appellate Case No. 2024-001476, a petition for writ of certiorari in *Stafford v. State*, Appellate Case No. 2024-000979, a post hearing brief in *Stone v. State*, Case No. 2018-CP-43-01025 (a capital PCR case), and a petition for writ of

certiorari in the Supreme Court of the United States regarding the opinion in *Stanko v. Stirling*, 109 F.4th 681 (4th Cir. 2024).

Counsel is working on this pleading, will devote time to it over the upcoming holiday weekend, and anticipates completing it without need for additional extensions.

This request was due yesterday, January 15, 2025, and Counsel respectfully request this Court accept it out of time.

Prior to filing this pleading, counsel conferred with counsel for the State, and Mr. Evans indicated the State consents to this request.

By s/E. Charles Grose, Jr.

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January 16, 2025
Greenwood, South Carolina