

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Florence County

Honorable Walton J. McLeod, IV, Circuit Court Judge

DIONDRAE E. JACKSON,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2024-000952

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

Counsel for Diondrae Emanuel Jackson respectfully requests a **final thirty (30) day extension, from February 14, 2025 until March 17, 2025**, 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 Diondrae Emanuel Jackson respectfully submits that extraordinary

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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 her caseload, counsel hopes that no further extension requests will be required.

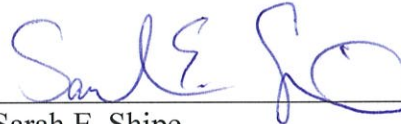
3. Counsel will file the Petition for Writ of Certiorari and the Appendix in the case of Eddie Blash v. The State with this Court today, February 14, 2025. Counsel filed the Petition for Writ of Certiorari to the Court of Appeals in the case of The State v. Bradley Mark Corlew with the Supreme Court on February 11, 2025. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Xzariera O. Gray with the Court of Appeals on February 6, 2025. Counsel filed the *Johnson* Petition for Writ of Certiorari in the case of Naijuwan S. Chisolm v. The State with the Supreme Court on January 27, 2025. Counsel filed the *Anders* Brief of Appellant and the Record on Appeal in the case of The State v. Michael David Morgan with the Court of Appeals on January 15, 2025. Counsel filed the *Anders* Brief of Appellant and the Record on Appeal in the case of The State v. Jaylen Shyir Wilson with the Court of Appeals on January 13, 2025. Counsel filed the Initial Brief of Respondent and Designation of Matter in the case of Joshua Felipe Simmons v. The State with the Court of Appeals on January 10, 2025. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Brandan Richardson with the Court of Appeals on January 3, 2025. Counsel filed the Petition for Writ of Certiorari to the Court of Appeals in the case of Brian Foster v. The State with the Supreme Court on January 2, 2025. Counsel filed the Petition for Rehearing in the case of The State v. Bradley Mark Corlew with the Court of Appeals on December 19, 2024.

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

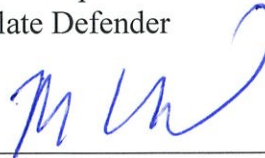
5. On January 31, 2025, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through February 28, 2025.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension from February 14, 2025 until March 17, 2025**, 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,



Sarah E. Shipe
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 14th day of February, 2025.