

RECEIVED
May 16 2025
SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Beaufort County

Carmen T. Mullen, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

JONATHAN JABREAL ROBINSON, III,

APPELLANT.

APPELLATE CASE NO. 2024-000994

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

Counsel for Jonathan Jabreal Robinson respectfully requests a **fourth and final thirty (30) day extension from May 16, 2025 until June 16, 2025** in which to serve and file the Initial Brief of Appellant and Designation of Matter in the above-referenced case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. 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 today.
2. Counsel for Jonathan Jabreal Robinson 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 her caseload, counsel hopes that no further extension requests will be required.

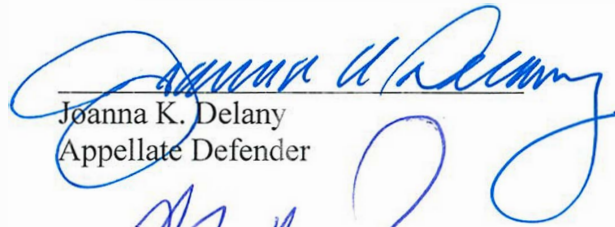
3. Counsel filed the *Anders* Brief of Appellant and Designation of Matter in the case of The State v. Robby W. Tracy with the Court of Appeals on May 15, 2025. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Christopher A. Cravets with the Court of Appeals on May 5, 2025. Counsel appeared for Oral Argument in the case of The State v. Ray Kelly before the Court of Appeals on April 16, 2025. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Dwight A. Powell, Jr. with the Court of Appeals on April 9, 2025. Counsel appeared for Oral Argument in the case of The State v. Marcus A. Wigfall before the Court of Appeals on April 8, 2025. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Marquise D. Franklin with the Court of Appeals on March 27, 2025.

4. Counsel makes this request in good faith and not for purpose of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

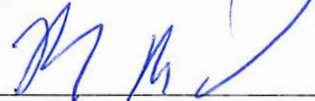
5. On April 30, 2025, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through May 31, 2025.

WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension from May 16, 2025 until June 16, 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.

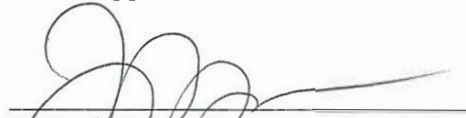
Respectfully submitted,



Joanna K. Delany
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 16th day of May, 2025.

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Beaufort County

Honorable Carmen T. Mullen, Circuit Court Judge

RECEIVED

May 16 2025

SC Court of Appeals

THE STATE,

RESPONDENT,

V.

JONATHAN JABREAL ROBINSON, III,

APPELLANT.

APPELLATE CASE NO. 2024-000994

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 in the above-referenced case has been served upon Mark R. Farthing, Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), this 16th day of May, 2025.


Joanna K. Delany
Appellate Defender

ATTORNEY FOR APPELLANT

RECEIVED

May 16 2025

SC Court of Appeals

From: [Mcinnis, Sara](#)
To: [Mark Farthing](#)
Cc: [Caroline Collins](#); [Delany, Joanna](#)
Subject: 2024-000994 The State v. Jonathan J. Robinson III Extension 4
Date: Friday, May 16, 2025 12:22:00 PM
Attachments: 2024-000994 The State v. Jonathan J. Robinson III Extension 4.pdf

Good Afternoon Mr. Farthing,

Attached for service in the above-referenced case is the fourth motion for an extension of time to serve and file the initial brief of appellant and designation of matter. This motion will be filed with the Court of Appeals today, May 16, 2025, via email filing.

Respectfully,

Sara McInnis

Administrative Assistant

South Carolina Commission on Indigent Defense

Appellate Division

(803) 734-1330