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May 28 2025

S.C. SUPREME COURT

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Marion County

Honorable G.D. Morgan, Jr., Circuit Court Judge

JAYME D. GAMBLE,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2025-000302

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

Counsel for Jayme Gamble respectfully requests an extension of thirty (30) days from May 28, 2025 until June 27, 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 second 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 Jayme Gamble 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 his caseload, counsel hopes that no further extension requests will be required.

3. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Tyriese Robinson with the Court of Appeals on Thursday, May 22, 2025. Counsel is working on the Reply to Return to the Petition for Writ of Certiorari to the Court of Appeals in the case of The State v. Bowen Turner which is due to be filed with this Court on June 3, 2025. Counsel appeared before the Court of Appeals for Oral Argument in the case of The State v. James M. Brown on May 6, 2025. Counsel filed the Petition for Writ of Certiorari to the Court of Appeals in the case of The State v. Bowen Turner with this Court on April 25, 2025. Counsel filed the Initial Reply Brief of Appellant in the case of The State v. Gregory G. Benjamin with the Court of Appeals on April 30, 2025. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Anthony Dayon Best v. The State with this Court on Friday, April 18, 2025. Counsel was scheduled to appear for Oral Argument in the case of The State v. Anijah Yarnell before the Court of Appeals on April 15, 2025. Counsel filed the Petition for Writ of Certiorari and the Appendix in the case of William Anthony Wallace v. The State with this Court on April 11, 2025. **Counsel also has extensive administrative duties as the Chief Appellate Defender, including attempting to hire another Appellate Defender and an administrative assistant, while carrying a full caseload.**

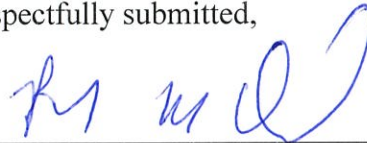
4. Counsel makes this request in good faith and not for purpose of delay.

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 thirty (30) day extension from May 28, 2025 until June 27, 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 serving and filing the Petition for Writ of Certiorari and Appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Robert M. Dudek
Chief Appellate Defender

This 28th day of May, 2025.