

**RECEIVED**

**Jun 11 2025**

**S.C. SUPREME COURT**

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

---

Certiorari to Spartanburg County

Honorable Perry H. Gravely, Circuit Court Judge

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TRAVIS JESSUP,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2025-000259

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

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Counsel for Travis Jessup respectfully requests an extension of thirty (30) days from June 11, 2025 until July 11, 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 Travis Jessup 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.

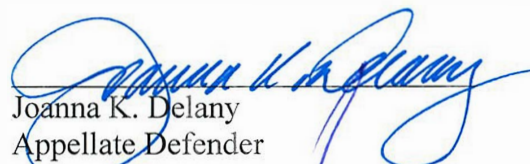
3. Counsel filed the Return to the Petition for Rehearing in the case of In the Interest of Khalid J. with the Court of Appeals on June 9, 2025. Counsel appeared for Oral Argument in the case of Ronnie Swofford v. State before the Court of Appeals on June 4, 2025. Counsel filed the *Johnson* Petition for Writ of Certiorari and Appendix in the case of Justin A. Armstrong v. State with the Supreme Court on May 21, 2025. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Michael J. Dennis v. State with the Supreme Court on May 20, 2025. Counsel filed the *Anders* Brief of Appellant and Record on Appeal 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.

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


5. On May 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 June 30, 2025.

WHEREFORE, the undersigned counsel would respectfully request a thirty (30) day extension from June 11, 2025 until July 11, 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,



Joanna K. Delany  
Appellate Defender



Robert M. Dudek  
Chief Appellate Defender

This 11th day of June, 2025.