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S.C. SUPREME COURT

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Spartanburg County

Honorable Perry H. Gravely, Circuit Court Judge

TRAVIS JESSUP,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2025-000259

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

Counsel for Travis Jessup respectfully requests a **final thirty (30) day extension from July 11, 2025 until August 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 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 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 Initial Brief of Appellant and Designation of Matter in the case of The State v. Marcus C. White with the Court of Appeals on July 9, 2025. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Terrance Wing with the Court of Appeals on June 26, 2025. Counsel filed the Brief of Petitioner in the case of Keylan J. Durham v. State with the Court of Appeals on June 20, 2025. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Jonathan J. Robinson, III with the Court of Appeals on June 16, 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.

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

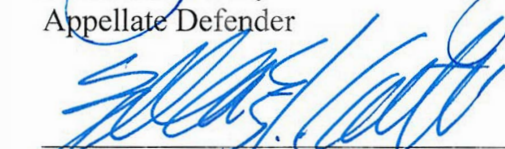
5. On June 27, 2025, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through July 31, 2025.

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



Wanda H. Carter
Interim Chief Appellate Defender

This 11th day of July, 2025.