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S.C. SUPREME COURT

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Aiken County

Honorable Brian M. Gibbons, Circuit Court Judge

JAMAQUES SALLEY,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2024-001320

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

Counsel for Jamaques Salley respectfully requests an extension of thirty (30) days from September 2, 2025 until October 2, 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 Jamaques Salley 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.

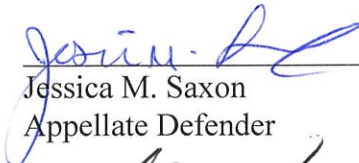
3. Counsel will file the Petition for Writ of Certiorari in the case of Donnell Washington v. The State with this Court on or before Friday, September 5, 2025. Counsel will file the Reply Brief of Appellant in the case of The State v. Michael Faile with the Court of Appeals today, September 2, 2025. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Jonathan Keith Bass with the Court of Appeals on Friday, August 29, 2025. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Michael Valdario with the Court of Appeals on August 15, 2025. Counsel filed the Return to Petition for Writ of Certiorari to the Court of Appeals in the case of The State v. Tirik Jaquan Johnson-Epps with this Court on August 7, 2025. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Jason C. Palmer with the Court of Appeals on July 30, 2025. Counsel filed the Petition for Writ of Certiorari to the Court of Appeals in the case of The State v. Ariel Robinson with this Court on July 28, 2025. Counsel filed the Return to Petition for Writ of Certiorari the Court of Appeals in the case of The State v. Samir Kevin Shank with this Court on July 25, 2025. Counsel filed the Petition for Writ of Certiorari and the Appendix in the case of Devonte Anderson v. The State with this Court on July 18, 2025. Counsel filed the Petition for Writ of Certiorari and the Appendix in the case of Bouvia Sales v. The State with this Court on July 18, 2025. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. James Curry with the Court of Appeals on July 7, 2025.

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

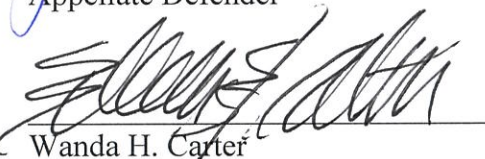
5. On August 27, 2025, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through September 30, 2025.

WHEREFORE, the undersigned counsel would respectfully request a thirty (30) day extension from September 2, 2025 until October 2, 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,



Jessica M. Saxon
Appellate Defender



Wanda H. Carter
Interim Chief Appellate Defender

This 2nd day of September, 2025.