

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

RECEIVED
Sep 02 2025
S.C. SUPREME COURT

Certiorari to Charleston County

Honorable Michael G. Nettles, Circuit Court Judge

JAMEL RAEKWON BROWN,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2025-000438

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

Counsel for Jamel Raekwon Brown 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 Jamel Raekwon Brown 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.

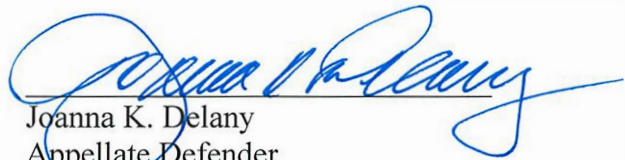
3. Counsel filed the Return to the Petition for Writ of Certiorari to the Court of Appeals in the case of In the Interest of Khalid J., A Juvenile Under the Age of Seventeen with the Supreme Court on August 20, 2025. Counsel filed the Petition for Rehearing in the case of The State v. Devin J. Johnson with the Court of Appeals on August 14, 2025. Counsel filed the *Johnson* Petition for Writ of Certiorari and Appendix in the case of David Eric Hugue, Jr. v. State with the Supreme Court on August 12, 2025. Counsel filed the Petition for Rehearing in the case of The State v. Ray Kelly with the Court of Appeals on July 31, 2025. Counsel filed the Return to the Petition for Writ of Certiorari to the Court of Appeals in the case of The State v. Quinterris J. Carmichael with the Supreme Court on July 28, 2025. Counsel filed the Brief of Petitioner in the case of The State v. Terry G. Gridine with the Supreme Court on July 24, 2025. Counsel filed the Petition for Rehearing in the case of The State v. Harold G. White, III with the Court of Appeals on July 17, 2025. Counsel filed the *Johnson* Petition for Writ of Certiorari and Appendix in the case of Travis Jessup v. State with the Supreme Court on July 14, 2025.

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

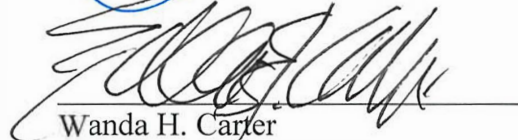
5. On August 27, 2025, opposing counsel, the Attorney General's office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through September 30, 2025.

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,



Joanna K. Delany
Appellate Defender



Wanda H. Carter
Interim Chief Appellate Defender

This 2nd day of September, 2025.