

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Horry County

Honorable Deadra L. Jefferson, Circuit Court Judge

JOHN KEHBORN,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2024-002166

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

Counsel for John Kehborn respectfully requests an extension of thirty (30) days 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 John Kehborn 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 reply brief of appellant and designation of matter in the case of The State v. Cleveland Maxwell with the Court of Appeals on August 25, 2025. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Travis Alston with the Court of Appeals on August 15, 2025. Counsel filed the brief of appellant pursuant to White v. State in the case of Jonathan Nieves v. The State with the Supreme Court on August 13, 2025. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jonathan Nieves v. The State with the Supreme Court on August 18, 2025. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Mustafa Salaam with the Court of Appeals on August 8, 2025. Counsel filed the initial brief of respondent in the case of The State v. Gene Alexzander Scott 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. Zachir Devaunte Shyiim McCall with the Supreme Court on July 23, 2025. Counsel filed the brief of appellant pursuant to White v. State in the case of Shelly Faulling v. The State with the Supreme Court on July 9, 2025. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Shelly Faulling v. The State with the Supreme Court on July 9, 2025. Counsel filed the initial brief of respondent in the case of The State v. John Wilson Williamson, III, et al. with the Court of Appeals on July 7, 2025. Counsel filed the reply to return to petition for writ of certiorari in the case of Edward Bonilla v. The State with the Supreme Court on June 18, 2025.

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

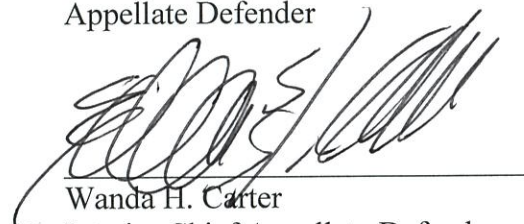
5. Counsel for the Attorney General's office has been informed of this request.

WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension, 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,



Jordan Wayburn
Appellate Defender



Wanda H. Carter
Interim Chief Appellate Defender

This 3rd day of September, 2025.