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Oct 27 2025

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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S.C. SUPREME COURT

Certiorari to Lexington County

Honorable Daniel McLeod Coble, Circuit Court Judge

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JAMIE S. GADSON,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2025-000983

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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 Jamie Gadson respectfully requests an extension of thirty (30) days from October 27, 2025 until November 26, 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 Jamie Gadson 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 Anders Brief of Appellant in the case of The State v. Kenneth Dawson with the Court of Appeals on October 22, 2025. Counsel filed the Petition for Writ of Certiorari to the Court of Appeals and the accompanying Appendix in the case of Jason Ervin Black v. The State with the Supreme Court on October 17, 2025. Counsel attended the mandatory Annual South Carolina Public Defender Conference in Myrtle Beach, South Carolina from October 6-8, 2025. Counsel filed the Johnson Petition for Writ of Certiorari and accompanying Appendix in the case of John Green v. The State with the Supreme Court on October 3, 2025. Counsel filed the Petition for Rehearing in the case of The State v. Demetrius Alexander Brown with the Court of Appeals on October 1, 2025. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Christova Pierre Knowlin with the Court of Appeals on September 30, 2025. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Shamar Latrell Stanley with the Court of Appeals on September 19, 2025. Counsel filed a Return to Motion to Appoint Outside Counsel in Gary Dubose Terry v. The State, a capital PCR, with the Supreme Court on September 11, 2025. Counsel spoke at the Summary Court Intensive Training on September 9, 2025. Counsel filed the Petition for Rehearing in the case of Jason Ervin Black v. The State with the Court of Appeals on August 11, 2025. Counsel was a presenter at a CLE in Columbia on August 9, 2025. Counsel filed the Brief of Appellant and Designation of Matter in the case of The State v. Bobbie Jo Baynard with the Court of Appeals on July 30, 2025. Counsel filed the Brief of Petitioner in the case of In the Matter of the Care and Treatment of Wiley Chapman with the Supreme Court on July 17, 2025. Counsel filed the Initial Brief of Appellant and Designation of Matter in the

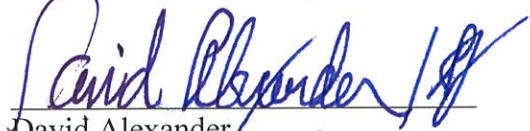
case of The State v. Marques Quantez Heath with the Court of Appeals on July 7, 2025.

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

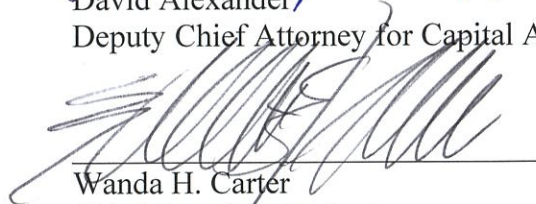
5. On September 25, 2025, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through October 31, 2025.

WHEREFORE, the undersigned counsel would respectfully request a thirty (30) day extension from October 27, 2025 until November 26, 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,



David Alexander  
Deputy Chief Attorney for Capital Appeals



Wanda H. Carter  
Chief Appellate Defender

This 27th day of October, 2025.