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S.C. SUPREME COURT

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Berkeley County

Honorable Kristi F. Curtis, Circuit Court Judge

JERALD JERMAINE HOWARD,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2025-001319

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

Counsel for Jerald Jermaine Howard respectfully requests an extension of thirty (30) days from December 3, 2025 until January 2, 2026 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 Jerald Jermaine Howard 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 with co-counsel W. Chandler Norville filed the Initial Brief of Respondent and Designation of Matter in the case of The State v. Ri'Shon Keltarian Gilliam with the Court of Appeals on November 26, 2025. Counsel filed the Initial Reply Brief of Appellant in the case of The State v. Clifton Kimble with the Court of Appeals on November 20, 2025. Counsel appeared for Oral Argument in the case of The State v. Mason Christopher Yarborough before the Court of Appeals on November 4, 2025. Counsel attended the mandatory Annual South Carolina Public Defender Conference in Myrtle Beach, South Carolina from October 6-8, 2025. Counsel filed the Petition for Writ of Certiorari and the Appendix in the case of Jacob D. Drotning v. The State with the Supreme Court on September 23, 2025. Counsel filed the Petition for Writ of Certiorari and the Appendix in the case of Stacy Murray v. The State with the Supreme Court on September 8, 2025. Counsel filed the Petition for Writ of Certiorari and the Appendix in the case of Adam Thomas Byrum v. The State with the Supreme Court on September 5, 2025. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Willis Terrel Ivey with the Court of Appeals on September 4, 2025.

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

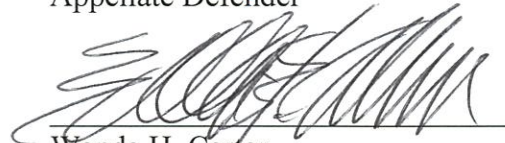
5. On November 26, 2025, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through January 5, 2026.

WHEREFORE, the undersigned counsel would respectfully request a thirty (30) day extension from December 3, 2025 until January 2, 2026, 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,



Molly M Keegan
Appellate Defender



Wanda H. Carter
Chief Appellate Defender

This 3rd day of December, 2025.