

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Colleton County

Honorable Frank R. Addy, Circuit Court Judge

BRADLEY L. JACKSON,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2025-001621

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

Counsel for Bradley Lamont Jackson respectfully requests an extension of thirty (30) days from January 28, 2026 until February 27, 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 Bradley Lamont Jackson respectfully submits that extraordinary

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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 with co-counsel Molly Keegan filed a Motion to Certify Case for Review by the South Carolina Supreme Court in the case of The State v. Ri'Shon Keltarian Gilliam on January 15, 2026. Counsel filed the Reply to Return to Petition for Writ of Certiorari in the case of Leslie Davis v. The State with this Court on January 9, 2026. Counsel filed the Brief of Appellant and the Record on Appeal in the case of The State v. Ray Edward Chestnut on December 31, 2025. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Brandon Lee Corder with the Court of Appeals on December 15, 2025. Counsel filed the Initial Reply Brief of Appellant in the case of The State v. Christopher Longshore with the Court of Appeals on December 5, 2025. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Philip Scott Steele with the Court of Appeals on December 1, 2025. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Terry Allen Paige, Jr. with the Court of Appeals on December 1, 2025. Counsel with co-counsel Molly Keegan 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.

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

5. On January 2, 2026, 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 February 1,

2026.

WHEREFORE, the undersigned counsel would respectfully request a thirty (30) day extension from January 28, 2026 until February 27, 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,



W. Chandler Norville
Appellate Defender



Wanda H. Carter
Chief Appellate Defender

This 28th day of January, 2026.