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Feb 06 2026

S.C. SUPREME COURT

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Clarendon County

Honorable Diane S. Goodstein, Circuit Court Judge

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JEREMIAH SMITH, JR.,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2025-001998

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

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Counsel for Jeremiah Smith, Jr. respectfully requests a **final thirty (30) day extension, from February 6, 2026 until March 9, 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 third 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 Jeremiah Smith, Jr. 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 initial brief of appellant and designation of matter in the case of The State v. William Oliver with the Court of Appeals on February 5, 2026. Counsel filed the Anders brief of appellant, designation of matter and record on appeal in the case of The State v. Jonathan Wilson with the Court of Appeals on January 28, 2026. Counsel filed the return to petition for writ of certiorari to the Court of Appeals in the case of The State v. Angelo Taylor with the Supreme Court on January 20, 2026. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Leon Amos Jason James v. The State with the Supreme Court on January 20, 2026. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Jackleen Elizabeth Mullen with the Court of Appeals on January 13, 2026. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of The State v. Ronzell Bilah Olds with the Supreme Court on January 12, 2026. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Drake Campbell v. The State with the Supreme Court on December 18, 2025.


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

5. On February 3, 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 28, 2026.

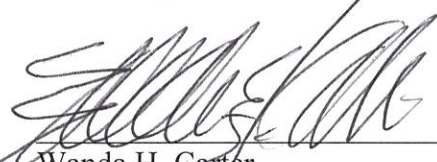
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, from February 6, 2026 until March 9, 2026**, in which to serve and file the petition for writ of certiorari and appendix in this case based upon the above exigent

circumstances. Counsel requests that time limits for filing the petition for writ of certiorari and appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Kathrine H. Hudgins  
Senior Appellate Defender



Wanda H. Carter  
Interim Chief Appellate Defender

This 6<sup>th</sup> day of February, 2026.