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May 12 2026

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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On Petition for Writ of Certiorari to Clarendon County  
Court of Common Pleas  
The Honorable Grace Gilchrist Knie, Circuit Court  
Judge

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Appellate Case No. 2025-000405

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Jonathan Cody Newman,

Petitioner,

v.

State Of South Carolina,

Respondent.

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**MOTION FOR A FOURTH EXTENSION OF TIME TO SERVE AND FILE THE  
RETURN TO PETITION FOR WRIT OF CERTIORARI**

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Counsel for Respondent respectfully moves for a **fourth** and **final** extension of thirty (30) days in which to serve and file the Return to Petition for Writ of Certiorari in this case. This is a fourth request for an extension. In support of this request, counsel shows:

1. The Return to Petition for a Writ of Certiorari is due to be served and filed with the Court today, May 12, 2026.
2. Counsel for Respondent respectfully submits that extraordinary circumstances exist that warrant the granting of an additional time extension. Given the number of extensions

previously granted and the order in which Counsel attempts to manage his heavy caseload, Counsel hopes that no further extension requests will be required.

3. Counsel had a term of court April 21-22, 2026, in the Sixteenth Circuit, in which Counsel is preparing the orders.
4. Counsel had an out-of-term hearing in Aiken on April 23, 2026, in Aiken County.
5. Counsel had a term of court May 4-8, 2026, in the Second Circuit.
6. Since the last extension request, Counsel has filed Returns to PCR applications in the following cases: 2020-05-00142, 2025-CP-02-01883, 2024-CP-02-02714.
7. Counsel has additionally been working on proposed orders due for prior PCR terms.
8. This extension request is made in good faith and not intended for delay, but rather due to Counsel's heavy workload and to ensure the return is properly researched and prepared.
9. Opposing counsel, Dayne Phillips, has graciously consented to this request.

**|SIGNATURE PAGE FOLLOWS|**

WHEREFORE, the undersigned Counsel would respectfully request a thirty-day extension in which to serve and file the Return to Petition for Writ of Certiorari in this case based upon the above exigent circumstances.

Respectfully submitted,

ALAN WILSON  
Attorney General

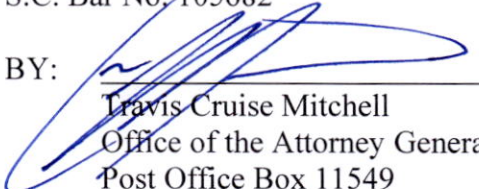
W. JEFFREY YOUNG  
Chief Deputy Attorney General

DONALD J. ZELENKA  
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Senior Assistant Deputy Attorney General

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Assistant Attorney General  
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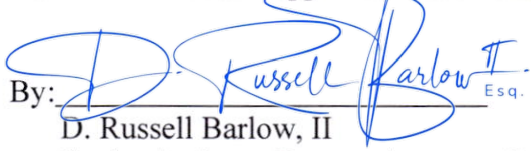
BY:



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ATTORNEYS FOR RESPONDENT

I have reviewed and approved this extension request.

By:   
D. Russell Barlow, II  
Senior Assistant Deputy Attorney General

This 12<sup>th</sup> day of May, 2026.