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Jul 17 2026

S.C. SUPREME COURT

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

On Petition for Writ of Certiorari to Clarendon County
Honorable Diane S. Goodstein, Circuit Court Judge
Appellate Case No. 2025-001998

JEREMIAH SMITH, JR.,

Petitioner,

vs.

STATE OF SOUTH CAROLINA,

Respondent.

**MOTION FOR FOURTH EXTENSION OF TIME WITHIN WHICH
TO SERVE AND FILE RETURN TO PETITION FOR WRIT OF CERTIORARI**

Respondent (“the State”), through its undersigned counsel, would respectfully show unto the Court as follows:

I.

The Return to Petition for Writ of Certiorari is due to be served and filed on July 17, 2026.

II.

Pursuant to RE: Extension Requests in Criminal Direct Appeals and Post-Conviction Relief Certiorari Proceedings: Order of the South Carolina Supreme Court dated March 18, 2009, the State moves for a **fourth** extension in the above-referenced post-conviction relief appeal and asks for an additional thirty days to complete the Return in this case. In the past several weeks, the undersigned counsel represented the State at an evidentiary hearing in the circuit court PCR matter of Arthur Bowers v. State (2022-CP-30-00700) and submitted a

proposed order in the circuit court PCR matter of David Walker v. State (2019-CP-30-00026). Additionally, the undersigned counsel filed a Return to Petition for Writ of Certiorari in Nicholas McIver v. State (2025-000602), a Return to Petition for Writ of Certiorari and Brief of Respondent pursuant to White v. State in Ezra Williams v. State (2025-001145), an Initial Brief of Respondent in State v. Jackleen Mullen (2024-001302), and a Return to Petition for Writ of Certiorari in Karlita Phillips v. State (2025-001346).

III.

The undersigned counsel submits this extension request is supported by extraordinary circumstances and is not intended for purposes of delay. The undersigned counsel is currently working on the Return in this case and intends to have it finished in a timely manner. However, the undersigned counsel has not yet been able to finish the Return due to a heavy workload. Accordingly, in order to ensure the Return is properly researched and prepared, I would therefore request an additional extension of time within which to serve and file the Return.

WHEREFORE, Respondent prays that the Court extend the deadline for the service and filing of the Return to Petition for Writ of Certiorari in this case for thirty days from the date such relief is granted; hold the matter in abeyance pending a ruling on Respondent's motion; and grant such other and further relief as the Court may deem just and proper.

Respectfully submitted,

ALAN WILSON
Attorney General

ZACHARY W. JONES
Assistant Attorney General

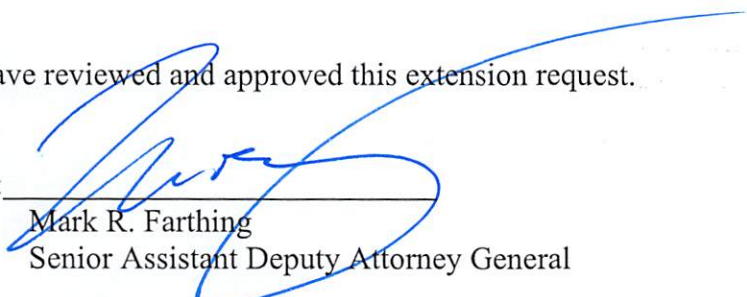
By: _____

Zachary W. Jones
S.C. Bar Number 104174

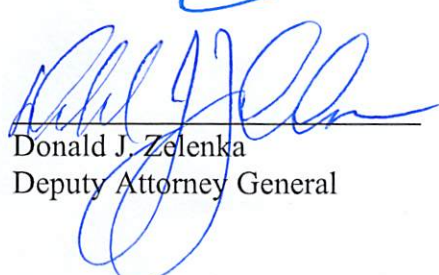
Office of the Attorney General
Post Office Box 11549
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(803) 734-3727

ATTORNEYS FOR RESPONDENT

I have reviewed and approved this extension request.

By: 

Mark R. Farthing
Senior Assistant Deputy Attorney General


Donald J. Zelenka

Deputy Attorney General

July 17, 2026