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Nov 04 2026

S.C. SUPREME COURT

STATE OF SOUTH CAROLINA
In The Supreme Court

Certiorari to Beaufort County
Honorable G.D. Morgan, Jr., Circuit Court Judge

Appellate Case No. 2026-000494

JAMIE JERMAINE ROBINSON,

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

The undersigned counsel would respectfully request a thirty (30) day extension in which to file the Return to Petition for Writ of Certiorari in the above-referenced case. Opposing counsel has consented to this request. In support of this motion, counsel would respectfully show the Court the following:

Respondent's Return is due today, November 4, 2026, as per this Court's Order dated October 6, 2026, granting Respondent's third extension request. The undersigned attorney for the Respondent has had a number of state and federal matters to attend to since October 6, 2026. In the past several weeks, the undersigned has done a substantial amount of research and work on this case and the following direct appeals: *State v. Tyler Givens* (2024-001995); *State v. Ryan*

Woodruff (2025-000101); and *State v. Kenneth Dawson* (2025-000114). Undersigned counsel has also filed a Reply to Motion to Dismiss in *Tyrone Ellison v. Warden Lee Correctional Institution* (1:26-02076-SAC-MGB); an Initial Brief of Respondent and Designation of Matter in *State v. Ronnie Todd* (2025-001649); a Final Brief of Respondent in *State v. Michael Whitlock* (2025-001221); a Reply to Return to Petition for Writ of Certiorari in *John Richard Wood v. State* (2026-001205); and a Petition for Rehearing in *Shelly Faulling v. State* (2025-000344).

Due to counsel's involvement in these and other matters, counsel is unable to timely complete the Return to Petition for Writ of Certiorari.

WHEREFORE, counsel respectfully requests a thirty (30) day extension of time to serve and file the Return to Petition for Writ of Certiorari.

Respectfully submitted,

ALAN WILSON
Attorney General

DONALD J. ZELENKA
Deputy Attorney General

MELODY J. BROWN
Senior Assistant Deputy Attorney General

DANIELLE DIXON
Assistant Attorney General
S.C. Bar No. 73999

Post Office Box 11549
Columbia, South Carolina 29211
(803) 734-6305

By: *s/Danielle Dixon*
Danielle Dixon

ATTORNEYS FOR RESPONDENT

November 4, 2026

I support the finding of good cause.

By:_____
MELODY J. BROWN,
Senior Assistant Deputy Attorney General

I, too, support the finding of good cause.

By:_____
DONALD J. ZELENKA
Deputy Attorney General

November 4, 2026