

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Appeal from Charleston County
Deadra L. Jefferson, Circuit Court Judge

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S.C. Supreme Court

THE STATE,

RESPONDENT,

V.

DANIEL JENKINS,

PETITIONER

APPELLATE CASE NO. 2012-212544

PETITION FOR EXTENSION TO FILE
BRIEF OF RESPONDENT

Counsel for Daniel Jenkins respectfully requests an extension of twenty (20) days in which to file the Brief of Respondent in this case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated July 16, 2014. This is first request for an extension pursuant to this Order. In support of this request, counsel shows:

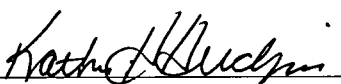
1. The Brief of Respondent is due to be served and filed with the Court today.
2. Counsel for Daniel Jenkins respectfully submits that good cause exists which warrants the granting of this extension of time.
3. Counsel filed the petition for rehearing in the case of State v. Julio Hunsburger with the Court of Appeals on November 20, 2014. Counsel had an oral argument in the case of Demetrius Price v. State in this Court on November 20, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Donald Jones v. State with this Court on November 17, 2014. Counsel filed the initial brief of appellant and designation of matter in the

case of State v. Julius Curry with the Court of Appeals on November 12, 2014. Counsel filed the reply to the state's return to petition for writ of certiorari in the case of Milo Tudor v. State with this Court on November 6, 2014. Counsel filed the initial reply brief of appellant in the case of State v. Marquis Robinson with the Court of Appeals on November 5, 2014. Counsel filed a petition for writ of certiorari in the case of Donta Kevon Reid v. State of South Carolina with the United States Supreme Court on November 4, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Gowndell Cades with the Court of Appeals on October 24, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Eric Todd Burgess v. State with this Court on October 22, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Rufus Raiden with the Court of Appeals on October 20, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Thomas Porter v. State with this Court on October 20, 2014.

4. Counsel makes this request in good faith and not for purpose of delay.
5. Counsel for the Attorney General's office has been informed of this request.

WHEREFORE, the undersigned counsel would respectfully request a twenty day extension, in which to file the Brief of Respondent in this case based upon the above stated reasons. Counsel requests that time limits for filing the brief be held in abeyance pending a ruling on this motion.

Respectfully submitted,


Kathrine H. Hudgins
Appellate Defender

Attorney for Respondent

November 24, 2014

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THE STATE,

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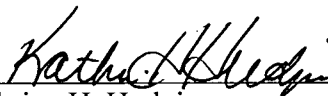
DANIEL JENKINS,

PETITIONER

APPELLATE CASE NO. 2012-212544

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true copy of the petition for extension to file brief of petitioner in the above referenced case has been served upon Mark Farthing, Esquire, at Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, and upon the South Carolina Court of Appeals, this 24th day of November 2014.



Kathrine H. Hudgins
Appellate Defender

ATTORNEY FOR PETITIONER.

SUBSCRIBED AND SWORN TO before me
this 24th day of November, 2014.



(L.S.)

Notary Public for South Carolina

My Commission Expires: October 24, 2021.