

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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JAN - 9 2015

Certiorari to York County  
Lee S. Alford, Circuit Court Judge

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S.C. Supreme Court

THE STATE,

RESPONDENT,

V.

JASON ALAN JOHNSON,

PETITIONER

APPELLATE CASE NO. 2014-002097

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MOTION FOR AN EXTENSION OF TIME  
IN WHICH TO FILE THE BRIEF OF PETITIONER

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Counsel for Jason Johnson respectfully requests an extension of ten (10) days in which to file the brief of petitioner 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 petitioner is due to be served and filed with the Court today.
2. Counsel for Jason Johnson respectfully submits that good cause exists which warrants the granting of this extension of time.
3. **Counsel filed the initial brief of appellant and designation of matter in the case of State v. Ricky Lee Blackwell, a direct appeal in a capital case with a transcript of 4,751 pages long, with this Court, as a co-counsel on January 8, 2015.** Counsel filed the initial brief of appellant and designation of matter in the case of State v. Sheldon Lamar Kelly with the Court of Appeals on December 29, 2014. Counsel filed the brief of petitioner in the case

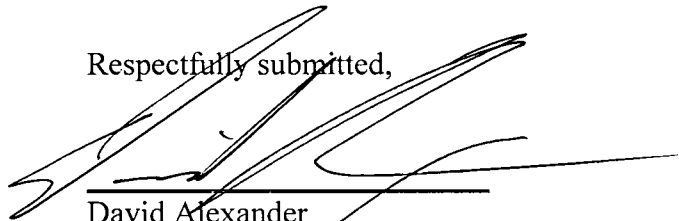
of State v. Manuel Antonio Marin with this Court on December 11, 2014. Counsel had an oral argument in the case of Michael D. Hall v. State of South Carolina in this Court on December 9, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Thomas Earnest Webb v. State of South Carolina with this Court on November 19, 2014. Counsel filed the brief of appellant in the case of State v. Joshua A. Reed with the Court of Appeals on November 13, 2014. Counsel filed the brief of appellant in the case of State v. Shawn William Sharpe with the Court of Appeals on November 12, 2014. On November 7, 2014, counsel spoke at a Seminar for South Carolina Magistrate Judges. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jamar Lavert Belk v. State of South Carolina with this Court on November 4, 2014. Counsel was a speaker during the group sessions for the Appellate Practice Project on October 30, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Kelvin Jackson with the Court of Appeals on October 30, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Christopher W. Berke with the Court of Appeals on October 29, 2014. Counsel filed the brief of appellant in the case of State v. Jessie Davis with the Court of Appeals on October 27, 2014. Counsel filed the initial reply brief in the case of State v. Lamar Sequan Brown with the Court of Appeals on October 27, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Zachary Fowler v. State of South Carolina with this Court on October 22, 2014. Counsel filed the petition for rehearing in the case of State v. Anthony Jackson with the Court of Appeals on October 14, 2014. Counsel filed the initial reply brief in the case of State v. Erick Arroyo with the Court of Appeals on October 10, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Sterling Devonte Brown v. State of South Carolina with this Court on October 9, 2014. Counsel filed the petition

for writ of certiorari and accompanying appendix in the case of Markelle Jamar Reid v. State of South Carolina with this Court on October 8, 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 ten day extension, in which to file the brief of petitioner in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'David Alexander', is written over a horizontal line. The signature is stylized and extends to the right of the line.

David Alexander  
Appellate Defender

Attorney for Petitioner

January 9<sup>th</sup>, 2015

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THE STATE,

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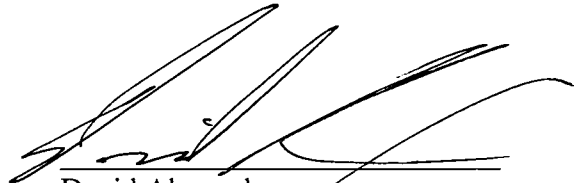
PETITIONER

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CERTIFICATE OF SERVICE

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I certify that a true copy of the motion for an extension of time in which to file the brief of petitioner in the above case has been served upon William M. Blich, Jr., Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 9<sup>th</sup> day of January, 2015.



David Alexander  
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 9<sup>th</sup> day  
of January, 2015.

 (L.S.)

Notary Public for South Carolina  
My Commission Expires: July 3, 2023.