

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

CERTIORARI TO SPARTANBURG COUNTY  
Court of Common Pleas

The Honorable R. Scott Sprouse, Circuit Court Judge

Appellate Case No. 2015-001769

Roy James Jenkins, #349450, Respondent,

v.

State of South Carolina, Petitioner.

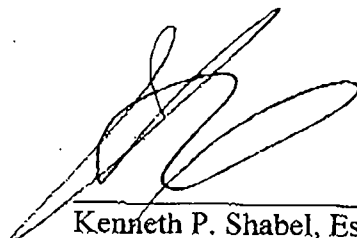
MOTION TO EXTEND TIME TO FILE  
RESPONDENT'S RETURN TO PETITION

Respondent moves this Court to extend the deadline to file the Respondent's Return to the Petition for Certiorari to April 2, 2016. The current deadline is March 3, 2016.

I hereby certify that this extension is necessary due to exceptional circumstances. In the past thirty days, the undersigned attorney has had a very heavy hearing and mediation schedule.

The undersigned certifies that this motion is not being made to cause unnecessary delay.

March 2, 2016

  
Kenneth P. Shabel, Esq.  
Campbell & Shabel, LLC  
175 Magnolia Street, Suite 201  
Spartanburg, S.C. 29306

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Attorney for Appellant

Other Counsel of Record:

Alan Wilson, Attorney General  
Alicia A. Olive, Assistant Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29211  
803-734-3737  
Attorneys for the Petitioner

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S.C. SUPREME COURT

Roy James Jenkins, #349450, Respondent,

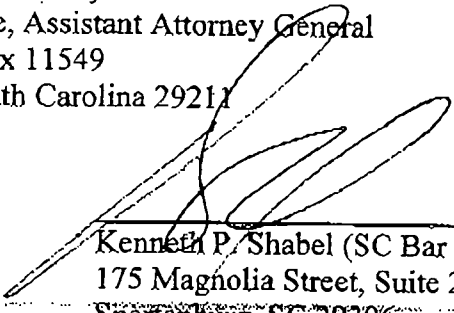
v.

State of South Carolina, Petitioner.

PROOF OF SERVICE

I hereby certify that a copy of the foregoing Notice of Appeal was served upon all counsel of record and/or unrepresented parties by U.S. Postal Service first class mail, postage prepaid, on the 2<sup>nd</sup> day of March, 2016 to the address as follows:

Alan Wilson, Attorney General  
Alicia A. Olive, Assistant Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29211



Kenneth P. Shabel (SC Bar #16136)  
175 Magnolia Street, Suite 201  
Spartanburg, SC 29306  
Tel. (864) 583-0001  
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Attorneys for Appellant

Shawn M. Campbell  
Kenneth P. Shabel

# Campbell & Shabel

ATTORNEYS AT LAW

Sender's Email: [kshabel@cc-lawfirm.com](mailto:kshabel@cc-lawfirm.com)

OF COUNSEL:  
Sean Giovannetti

Wednesday, March 02, 2016

**VIA Regular Mail**

The Honorable Daniel E. Shearouse, Clerk  
Supreme Court of South Carolina  
P.O. Box 11330  
Columbia, SC 29211

RECEIVED

MAR 03 2016

S.C. SUPREME COURT

Re: Roy James Jenkins, #349450 v. State of South Carolina  
*Appellate Case No. 2015-001769*

Dear Mr. Shearouse:

Please find enclosed an original and six (6) copies of a Motion to Extend Deadline I am filing in this case. The required Motion fee is also enclosed.

Do not hesitate to contact me if you have further questions or need additional information.

Best regards,



Kenneth P. Shabel  
Attorney for Roy James Jenkins

\Enclosures

cc: Alan Wilson / Alicia A. Olive, Attorneys for State of South Carolina



Shawn M. Campbell  
Kenneth P. Shabel

# Campbell & Shabel

ATTORNEYS AT LAW

Sender's Email: [nancym@cc-lawfirm.com](mailto:nancym@cc-lawfirm.com)

RECEIVED

MAR 03 2016  
S.C. SUPREME COURT

OF COUNSEL:  
Case Giovanni

## FACSIMILE TRANSMITTAL SHEET

To:	From:
Daniel E. Shearouse, Clerk of Court	Nancy Mierek for Kenneth Shabel
Company:	Date:
SC Supreme Court	Thursday, March 03, 2016
FAX NUMBER	Pages (including cover):
803-734-1499	5
	Reference:
803-734-1080	Jenkins v SC 2015-001769

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