

The Supreme Court of South Carolina

The State,

Petitioner,

v.

Jonathan K. Hill,

Respondent.

The Honorable John C. Few
Greenville County
Trial Court Case No. 2002-GS-23-01807
2002-GS-23-01808: 2002-GS-23-02590
2002-GS-23-02737

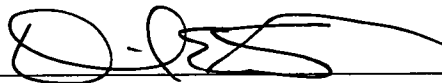
ORDER

The request for an extension to serve and file the Return to the Petition for Writ of Certiorari is granted and extended until April 27, 2012. Pursuant to this Court's order dated March 18, 2009, any further extension request must be based on a showing of good cause.

IT IS SO ORDERED.

JEAN H. TOAL, CHIEF JUSTICE

BY



Clerk

Columbia, South Carolina

March 29, 2012

cc: Assistant Attorney General Mark R. Farthing
Appellate Defender Wanda H. Carter

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Greenville County
John C. Few, Circuit Court Judge

RECEIVED

MAR 28 2012

S.C. Supreme Court

2

JONATHAN K. HILL,
(Case Tracking # 2011-201546)

RESPONDENT,

V.

STATE OF SOUTH CAROLINA,

PETITIONER

**PETITION FOR EXTENSION TO FILE THE
RETURN TO PETITION FOR WRIT OF CERTIORARI**

The undersigned counsel would respectfully request a thirty day extension in which to file the return to petition for writ of certiorari in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following exigent circumstances:

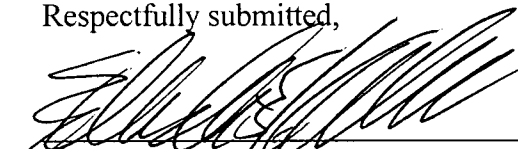
1. The return to petition for writ of certiorari in this case are due to be served and filed today, having been extended by one prior order of this Court.
2. Counsel is preparing for an oral argument in the case of Brian Gebhard v. State in the Court of Appeals on March 29, 2012. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Lenson Clyburn, Jr. v. State in the Supreme Court on March 26, 2012. Counsel filed petitions for writ of certiorari and

accompanying appendices in the cases of Glenn Pernell v. State, Sylvester Toomer v. State and William Gladney Harden v. State in the Supreme Court on March 23, 2012. Counsel had an oral argument in the case of State v. Lewis Williams in the Court of Appeals on March 12, 2012. In February 2012, Counsel had oral arguments in the cases of State v. Otis Lamar Bland and State v. James Babb in the Court of Appeals, as well as an oral argument in the case of Benjamin Green v. State in the Supreme Court. Additionally in February, 2012, Counsel filed the petitions for writ of certiorari and accompanying appendices in the cases of Sherinette Wannamaker v. State, Henry Belton v. State, Tony Drayton v. State, William Hickman v. State and John E. Prigmore v. State. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Lawrence Brown in the Court of Appeals in February, 2012 as well.

3. This request is made in good faith, and not for purposes of delay.

WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension in which to file the return to petition for writ of certiorari in this case. Counsel requests that the time limits for filing the return to petition for writ of certiorari be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Wanda H. Carter
Deputy Chief Appellate Defender

March 28, 2012

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Greenville County

John C. Few, Circuit Court Judge

JONATHAN K. HILL,

RESPONDENT,

V.

STATE OF SOUTH CAROLINA,

PETITIONER

CERTIFICATE OF SERVICE

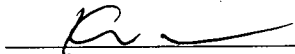
The undersigned attorney hereby certifies the petition in which to file the return to petition for writ of certiorari and appendix in the above referenced case has been served upon Matthew J. Friedman, Esquire, Assistant General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Rm. 519, Columbia, SC 29201, this 28th day of March, 2012.



Wanda H. Carter
Deputy Chief Appellate Defender

ATTORNEY FOR RESPONDENT

SUBSCRIBED AND SWORN TO before me
this 28th day of March, 2012.



(L.S.)
Notary Public for South Carolina
My Commission Expires: October 2, 2013 .

The Supreme Court of South Carolina

The State,

Petitioner,

v.

Jonathan K. Hill,

Respondent.

The Honorable John C. Few
Greenville County
Trial Court Case No. 2002-GS-23-01807
2002-GS-23-01808; 2002-GS-23-02590
2002-GS-23-02737

ORDER

The request for an extension to serve and file the Return to Petition for Writ of Certiorari is granted and extended until March 28, 2012. Pursuant to this Court's order dated March 18, 2009, any further extension request must be based on a showing of good cause.

IT IS SO ORDERED.

JEAN H. TOAL, CHIEF JUSTICE

BY Branda J. Shely
Chief Deputy Clerk

Columbia, South Carolina

February 28, 2012

cc: Appellate Defender Wanda H. Carter
Assistant Attorney General Mark R. Farthing



Division of Appellate Defense
1330 Lady Street, Suite 401
Columbia, South Carolina 29201-3332
Post Office Box 11589
Columbia, South Carolina 29211-1589
Telephone: (803) 734-1330
Facsimile: (803) 734-1397

Robert M. Dudek, Chief Appellate Defender
Wanda H. Carter, Deputy Chief Appellate Defender

February 27, 2012

RECEIVED

FEB 27 2012

S.C. Supreme Court

Honorable Daniel E. Shearouse
Clerk, South Carolina Supreme Court
Post Office Box 11330
Columbia, South Carolina 29211

Re: State of South Carolina v. Jonathan K. Hill
Case Tracking # 2011-201546

Dear Mr. Shearouse:

The return to the petition for writ of certiorari in the above-referenced case is due to be served and filed today. Because of my present workload, I respectfully request a thirty-day extension of this deadline. No prior extensions have been requested in this case.

By copy of this letter, I am informing Mark R. Farthing, Esquire, of the Office of the Attorney General, of this extension request.

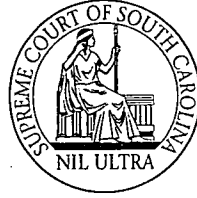
Thanking you for your cooperation and assistance in this matter.

Sincerely,

Wanda H. Carter
Deputy Chief Appellate Defender

WHC/kam

cc: Mark R. Farthing



The Supreme Court of South Carolina

DANIEL E. SHEAROUSE
CLERK OF COURT

BRENDA F. SHEALY
CHIEF DEPUTY CLERK

POST OFFICE BOX 11330
COLUMBIA, SOUTH CAROLINA 29211

(803) 734-1080

FAX (803) 734-1499

February 3, 2012

Assistant Attorney General Mark R. Farthing
Office of the Attorney General
P.O. Box 11549
Columbia, SC 29211

Re: The State v. Hill, Jonathan K.
Case Tracking No. 2011-201546

Dear Counsel:

This office has received your Petition for Writ of Certiorari in the above matter. It has been assigned the Case Tracking Number that appears above. Please use this number on all future correspondence relating to this matter.

I do wish to call the attention of the parties to the attached order relating to the inclusion of personal data identifiers and other sensitive information in documents filed with the Supreme Court of South Carolina and the South Carolina Court of Appeals. Please note that the responsibility for insuring that information is redacted or sealed as required by this order rests with counsel and the parties. This office will not review filings for redaction or to determine if materials should be sealed.

Very truly yours,



CLERK

DES/lda

Enclosure

cc: Appellate Defender Wanda H. Carter
The Honorable Tanya Gee



ALAN WILSON
ATTORNEY GENERAL

January 27, 2012

RECEIVED

FEB 01 2012

S.O. SUPREME COURT
pm 1-27-12

Wanda H. Carter, Esquire
S.C. Commission on Indigent Defense
Division of Appellate Defense
Post Office Box 11589
Columbia, SC 29211

RE: State v. Jonathan Karon Hill

Dear Ms. Carter:

I am enclosing two (2) copies of the Petition for Writ of Certiorari and Appendix, along with proof of service, in the above-referenced case.

Sincerely,

Mark R. Farthing
Assistant Attorney General

MRF/erd
Enclosures

cc: Honorable Daniel E. Shearouse (original and six enclosed)
Victim Services



SCCID

SOUTH CAROLINA COMMISSION ON INDIGENT DEFENSE

Division of Appellate Defense
1330 Lady Street, Suite 401
Columbia, South Carolina 29201-3332
Post Office Box 11589
Columbia, South Carolina 29211-1589
Telephone: (803) 734-1330
Facsimile: (803) 734-1397

Robert M. Dudek, Chief Appellate Defender
Wanda H. Carter, Deputy Chief Appellate Defender

January 4, 2012

RECEIVED

JAN - 4 2012

Honorable Daniel E. Shearouse
Clerk, South Carolina Supreme Court
Post Office Box 11330
Columbia, South Carolina 29211

S.C. Supreme Court

Re: State v. Jonathan Hill

Dear Mr. Shearouse:

I consent to the request of the Attorney General's Office for a third extension in which to file the petition for writ of certiorari and accompanying appendix in the case of Jonathan Hill.

Sincerely,

Wanda H. Carter
Deputy Chief Appellate Defender

WHC/kam

cc: Mark Farthing

The Supreme Court of South Carolina

The State,

Respondent,

v.

Jonathan K. Hill,

Petitioner.

The Honorable John C. Few
Greenville County
Trial Court Case No. 2002-GS-23-01807
2002-GS-23-01808; 2002-GS-23-02590
2002-GS-23-02737

ORDER

For good cause shown, the request for an extension to serve and file the petition for writ of certiorari and appendix is granted and extended until January 27, 2012. Pursuant to this Court's order dated March 18, 2009, any further extension request must show the existence of extraordinary circumstances, state what actions are being taken to insure that no further extension will be required, and be signed by the appropriate attorneys.

IT IS SO ORDERED.

JEAN H. TOAL, CHIEF JUSTICE

BY



Clerk

Columbia, South Carolina

December 30, 2011

cc: Appellate Defender Wanda H. Carter
Assistant Attorney General Mark R. Farthing
The Honorable Tanya Gee

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Appeal from Greenville County
Honorable John C. Few, Circuit Court Judge

RECEIVED
DEC 28 2011
S.C. Supreme Court

THE STATE,

Petitioner,

(3)

vs.

JONATHAN KARON HILL,

Respondent.

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

Petitioner, through its undersigned counsel, would respectfully show unto the Court as follows:

I.

The Petition for Writ of Certiorari and the accompanying Appendix is due to be served and filed on December 28, 2011.

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 Petitioner moves for a third extension in the above-referenced criminal appeal. Due to work required in other cases pending before this Court and the South Carolina Court of Appeals, I am unable to complete this Petition on time. In the past few weeks, the undersigned has

participated in oral argument at the Court of Appeals in State v. Richard M. Kough, State v. Sonny Stonewall Hawkins, State v. Gerald Fripp, State v. John Porter Johnson, State v. Andra Byron Jamison, State v. James Robert Nash, and State v. Daniel J. Jenkins, has participated in oral argument at this Court in State v. Charles Q. Jackson and State v. Kevin Cornelius Odems, has submitted Initial Briefs to the Court of Appeals in State v. Simuel, State v. Rolen, State v. Simmons, State v. Green, State v. Jolly, State v. White, State v. Meggett, State v. Wesley, State v. Foster, State v. Price, and State v. Berry, has filed a Petition for Rehearing in the Court of Appeals in State v. Hill, State v. Coaxum, and State v. Morris, has filed a Brief of Respondent in this Court in State v. Odems, and has filed a Return to Petition for Certiorari in this Court in State v. Williams, State v. Bennett, State v. Avery, and State v. Romero.

III.

This extension request is not intended for purposes of delay, but rather to ensure that the Petition is properly researched and prepared. The Petition in the above case has required significant research because the case involves a significant jury issue on appeal. The undersigned is currently working on the Petition in this case and hopes to have it completed in a timely manner. I would therefore request an extension of time within which to serve and file the Petition for Writ of Certiorari and the accompanying Appendix.

WHEREFORE, Petitioner prays that the Court extend the deadline for the service and filing of the Petition for Writ of Certiorari and the accompanying Appendix in this case for thirty (30) days from the date such relief is granted; and for such other and further relief as the Court may deem just and proper.


Respectfully submitted,

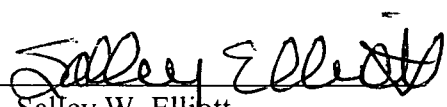
ALAN WILSON
Attorney General

JOHN W. McINTOSH
Chief Deputy Attorney General

SALLEY W. ELLIOTT
Assistant Deputy Attorney General

MARK R. FARTHING
Assistant Attorney General

By: 
Mark R. Farthing

By: 
Salley W. Elliott

Office of the Attorney General
Post Office Box 11549
Columbia, SC 29211
(803) 734-3727

December 28, 2011

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

RECEIVED

DEC 28 2011

Appeal from Greenville County
Honorable John C. Few, Circuit Court Judge **S.C. Supreme Court**

THE STATE,

Petitioner,

vs.

JONATHAN KARON HILL,


Respondent.

PROOF OF SERVICE

I, Angela S. Bennett, certify that I have served the within Motion for Third Extension of Time Within Which to Serve and File Petition for Writ of Certiorari on Respondent by depositing two copies of the same in the United States mail, postage prepaid, addressed to:

Wanda H. Carter, Esquire
S.C. Commission on Indigent Defense
Division of Appellate Defense
Post Office Box 11589
Columbia, SC 29211

I further certify that all parties required by Rule to be served have been served.
This 28th day of December, 2011.


ANGELA S. BENNETT
Legal Assistant

Office of the Attorney General
Post Office Box 11549
Columbia, SC 29211
(803) 734-3727



ALAN WILSON
ATTORNEY GENERAL

December 28, 2011.

The Honorable Daniel E. Shearouse
Clerk, South Carolina Supreme Court
Post Office Box 11330
Columbia, South Carolina 29211

RE: State v. Jonathan Karon Hill

Dear Mr. Shearouse:

Enclosed please find the original and six (6) copies of the Motion for Third Extension of Time Within Which to Serve and File Petition for Writ of Certiorari, along with proof of service, for filing in the above-referenced appeal.

Sincerely,

Mark R. Farthing
Assistant Attorney General

MRF/erd
Enclosures

cc: Wanda H. Carter, Esquire
Victim Services

RECEIVED
DEC 28 2011
S.C. Supreme Court

The Supreme Court of South Carolina

The State,

Respondent,

v.

Jonathan K. Hill,

Petitioner.

The Honorable John C. Few
Greenville County
Trial Court Case No. 2002-GS-23-01807
2002-GS-23-01808; 2002-GS-23-02590
2002-GS-23-02737

ORDER

For good cause shown, the request for an extension to serve and file the Petition for Writ of Certiorari and Appendix is granted and extended until December 28, 2011. Pursuant to this Court's order dated March 18, 2009, any further extension request must be based on a showing of good cause and must be signed by the appropriate attorneys.

IT IS SO ORDERED.

JEAN H. TOAL, CHIEF JUSTICE

BY



Clerk

Columbia, South Carolina

November 28, 2011

cc: Appellate Defender Wanda H. Carter
Assistant Attorney General Mark R. Farthing
The Honorable Tanya Gee

ORIGINAL

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Appeal from Greenville County
Honorable John C. Few, Circuit Court Judge

RECEIVED

NOV 23 2011

S.C. Supreme Court

2

THE STATE,

Petitioner,

vs.

JONATHAN KARON HILL,

Respondent.

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

Petitioner, through its undersigned counsel, would respectfully show unto the Court as follows:

I.

The Petition for Writ of Certiorari and the accompanying Appendix is due to be served and filed on November 23, 2011.

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 Petitioner moves for a second extension in the above-referenced criminal appeal. Due to work required in other cases pending before this Court and the South Carolina Court of Appeals, I am unable to complete this Petition on time. In the past few weeks, the undersigned

has participated in oral argument at the Court of Appeals in State v. William Coaxum, Sr., State v. Richard M. Kough, State v. Sonny Stonewall Hawkins, State v. Gerald Fripp, State v. John Porter Johnson, and State v. Andra Byron Jamison, has participated in oral argument at this Court in State v. Charles Q. Jackson, has submitted Initial Briefs to the Court of Appeals in State v. Simuel, State v. Rolen, State v. Simmons, State v. Green, State v. Jolly, State v. White, State v. Meggett, State v. Wesley, State v. Foster, and State v. Price, has filed a Petition for Rehearing in the Court of Appeals in State v. Hill and State v. Coaxum, has filed a Brief of Respondent in this Court in State v. Odems, and has filed a Return to Petition for Certiorari in this Court in State v. Williams, State v. Bennett, and State v. Avery.

III.

This extension request is not intended for purposes of delay, but rather to ensure that the Petition is properly researched and prepared. The Petition in the above case has required significant research because the case involves a significant jury issue on appeal. The undersigned is currently working on the Petition in this case and hopes to have it completed in a timely manner. I would therefore request an extension of time within which to serve and file the Petition for Writ of Certiorari and the accompanying Appendix.

WHEREFORE, Petitioner prays that the Court extend the deadline for the service and filing of the Petition for Writ of Certiorari and the accompanying Appendix in this case for thirty (30) days from the date such relief is granted; and for such other and further relief as the Court may deem just and proper.

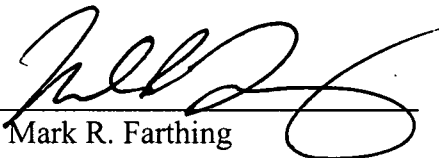
Respectfully submitted,

ALAN WILSON
Attorney General

JOHN W. McINTOSH
Chief Deputy Attorney General

SALLEY W. ELLIOTT
Assistant Deputy Attorney General

MARK R. FARTHING
Assistant Attorney General

By: 
Mark R. Farthing

Office of the Attorney General
Post Office Box 11549
Columbia, SC 29211
(803) 734-3727

November 23, 2011

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Appeal from Greenville County
Honorable John C. Few, Circuit Court Judge

RECEIVED

NOV 23 2011

S.C. Supreme Court

THE STATE,

Petitioner,

vs.

JONATHAN KARON HILL,

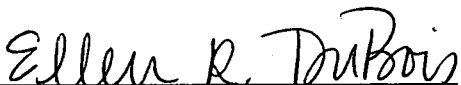
Respondent.

PROOF OF SERVICE

I, Ellen R. DuBois, certify that I have served the within Motion for Second Extension of Time Within Which to Serve and File Petition for Writ of Certiorari on Respondent by depositing two copies of the same in the United States mail, postage prepaid, addressed to:

Wanda H. Carter, Esquire
S.C. Commission on Indigent Defense
Division of Appellate Defense
Post Office Box 11589
Columbia, SC 29211

I further certify that all parties required by Rule to be served have been served.
This 23rd day of November, 2011.



ELLEN R. DuBOIS
Legal Assistant

Office of the Attorney General
Post Office Box 11549
Columbia, SC 29211
(803) 734-3727



ALAN WILSON
ATTORNEY GENERAL

November 23, 2011

The Honorable Daniel E. Shearouse
Clerk, South Carolina Supreme Court
Post Office Box 11330
Columbia, South Carolina 29211

RE: State v. Jonathan Karon Hill

Dear Mr. Shearouse:

Enclosed please find the original and six (6) copies of the Motion for Second Extension of Time Within Which to Serve and File Petition for Writ of Certiorari, along with proof of service, for filing in the above-referenced appeal.

Sincerely,

Mark R. Farthing
Assistant Attorney General

MRF/erd
Enclosures

cc: Wanda H. Carter, Esquire
Victim Services

RECEIVED

NOV 23 2011

S.C. Supreme Court

The Supreme Court of South Carolina

The State,

Respondent,

v.

Jonathan K. Hill,

Petitioner.

The Honorable John C. Few
Greenville County
Trial Court Case No. 2002-GS-23-01807
2002-GS-23-01808; 2002-GS-23-02590
2002-GS-23-02737

ORDER

The request for an extension to serve and file the Petition for Writ of Certiorari is granted and extended until November 23, 2011. Pursuant to this Court's order dated March 18, 2009, any further extension request must be based on a showing of good cause.

IT IS SO ORDERED.

JEAN H. TOAL, CHIEF JUSTICE

BY Brenda L. Shealy
Clerk

Chief Deputy

Columbia, South Carolina

October 25, 2011

cc: Appellate Defender Wanda H. Carter
Assistant Attorney General Mark R. Farthing
The Honorable Tanya Gee



ALAN WILSON
ATTORNEY GENERAL

October 24, 2011

①

VIA HAND-DELIVERY

The Honorable Daniel E. Shearouse
Clerk, SC Supreme Court
Post Office Box 11330
Columbia, South Carolina 29211

RECEIVED

OCT 24 2011

S.C. Supreme Court

Re: State v. Jonathan K. Hill

Dear Mr. Shearouse:

The Petition for Writ of Certiorari in the above appeal is due to be served and filed October 24, 2011. However, due to a heavy workload, I am requesting a 30-day extension to file this document. This is the first extension request at this stage in the process, and it is not intended for the purpose of delay.

I appreciate your consideration of this request and ask that you hold the filing time in abeyance during the time in which this request is pending.

By copy of this letter, I am informing counsel for Appellant of this extension request.

Sincerely,

Mark R. Farthing
Assistant Attorney General

MRF/erd

cc: Wanda H. Carter, Esquire
The Honorable Tanya A. Gee
Victim Services