

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Appeal from Orangeburg County

Honorable Maite Murphy, Circuit Court Judge

JAMES JONES,

ORIGINAL
RECEIVED
OCT 17 2016
S.C. SUPREME COURT
PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO 2016-000716

PETITION FOR EXTENSION TO FILE
PETITION FOR WRIT OF CERTIORARI
AND ACCOMPANYING APPENDIX

The undersigned counsel respectfully requests a thirty day extension, **until November 16, 2016**, in which to file the petition for writ of certiorari and accompanying appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The petition for writ of certiorari and accompanying appendix in this case are due to be served and filed today.
2. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Jacqueline Mesidor with the Court of Appeals on September 30, 2016. Counsel

filed the motion to hold appeal in abeyance and motion to remand for reconstruction of the record in the case of The State v. Terry MacCall with the Court of Appeals on September 30, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Tommy McKnight v. The State of South Carolina in the Supreme Court on September 28, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Antwine Matthews v. The State of South Carolina in the Supreme Court on September 26, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Bernardo Evans v. The State of South Carolina in the Supreme Court on September 26, 2016. Counsel had an oral argument in the case of The State v. Donte Samar Brown in the Court of Appeals on September 21, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Paula Reed Rose with the Court of Appeals on September 14, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Dennis F. Sanders v. The State of South Carolina in the Supreme Court on September 6, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Devionne Devaughn McClain with the Court of Appeals on September 6, 2016. Counsel filed the brief of petitioner and accompanying appendix in the case of Lloyd Wright v. State of South Carolina in the Supreme Court on August 17, 2016.

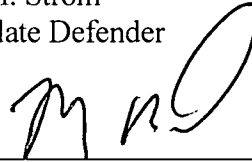
3. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

WHEREFORE, the undersigned counsel would respectfully request a thirty day extension. Counsel respectfully requests that the time limits for filing the petition for writ of certiorari and accompanying appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'John H. Strom', written over a horizontal line.

John H. Strom
Appellate Defender

A handwritten signature in black ink, appearing to read 'Robert M. Dudek', written over a horizontal line.

Robert M. Dudek
Chief Appellate Defender

October 17, 2016

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Appeal from Orangeburg County

Honorable Maite Murphy, Circuit Court Judge

JAMES JONES,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

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CERTIFICATE OF SERVICE

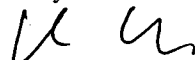
The undersigned attorney hereby certifies that a true copy of the petition for extension to file petition for writ of certiorari and accompanying appendix in the above referenced case has been served upon Ruston Neely, Esquire, Office of the Attorney General, at Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, this 17th day of October, 2016.



John H. Strom
Appellate Defender

ATTORNEY FOR PETITIONER.

SUBSCRIBED AND SWORN TO before me
this 17th day of October, 2016.

 (L.S.)
Notary Public for South Carolina
My Commission Expires: May 12th, 2025.