

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

ORIGINAL

Appeal from Orangeburg County

Honorable Maite Murphy, Circuit Court Judge

JAMES JONES,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO 2016-000716

MOTION FOR AN EXTENSION OF TIME
IN WHICH TO FILE THE PETITION FOR WRIT OF
CERTIORARI AND APPENDIX

Counsel respectfully requests a **final extension of thirty (30) days until December 16, 2016**, in which to file the petition for writ of certiorari and appendix in this case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. This is a third request for an extension. In support of this request, counsel shows:

1. The petition for writ of certiorari and appendix is due to be served and filed with the Court today.
2. Counsel respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions previously granted

and the order in which counsel attempts to manage his caseload, counsel hopes that no further extension requests will be required.

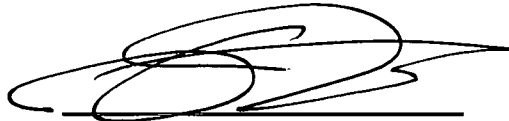
3. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Albert Owens v. The State of South Carolina in the Supreme Court on October 31, 2016. Counsel filed the petition for rehearing in the case of The State v. Daniel Martinez Herrera with the Court of Appeals on October 27, 2016. Counsel filed the reply brief pursuant to White v. State in the case of Daniel Hamrick v. The State of South Carolina in the Supreme Court on October 27, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Deitrich Funchess v. The State of South Carolina in the Supreme Court on October 26, 2016. Counsel attended a reconstruction hearing in the case of The State v. Joe Ross Worley on October 25, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Brandon Jermaine Benson with the Court of Appeals on October 17, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Alan Massey with the Court of Appeals on October 17, 2016. Counsel had an oral argument in the case of The State v. Alexander Carmichael Huckabee III in the Court of Appeals October 12, 2016. 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 McCall with the Court of Appeals on September 30, 2016.

4. Counsel makes this request in good faith and not for purpose 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.

5. Counsel for the Attorney General's office consents to this request as shown by signature below.

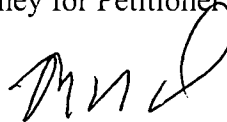
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension until December 16, 2016**, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances.

Respectfully submitted,



John H. Strom
Appellate Defender

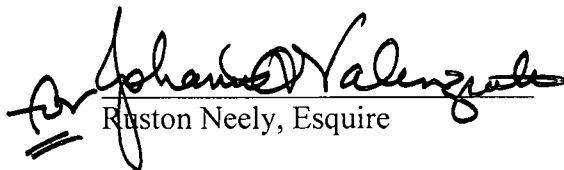
Attorney for Petitioner



Robert M. Dudek
Chief Appellate Defender

This 16th day of November, 2016

I Consent:



Ruston Neely, Esquire