

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Appeal from Beaufort County
R. Scott Sprouse, Circuit Court Judge

KELVIN JACKSON,

ORIGINAL
RECEIVED
APR 04 2018
S.C. SUPREME COURT
PETITIONER,

V.

THE STATE,

RESPONDENT.

APPELLATE CASE NO. 2017-002115

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

Counsel for Kelvin Jackson respectfully requests an extension of thirty (30) days 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 second request for an extension. In support of this request, counsel shows:

1. The petition for writ of certiorari and appendix are due to be served and filed with the Court today.
2. Counsel for Kelvin Jackson 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 her caseload, counsel hopes that no further extension requests will be required.

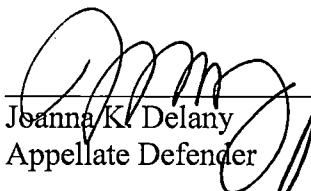
3. Counsel is currently preparing and consulting with Chief Appellate Defender, Robert M. Dudek, on the petition for writ of certiorari in the cases of Toshonda Mickens v. The State and Kelvin Jackson v. The State which she plans to file with the Supreme Court in the upcoming weeks. Counsel plans to file the petition for writ of certiorari and accompanying appendix in the case of Darrell Heyward v. State with the Supreme Court today, April 4, 2018. Counsel filed the petition for writ of certiorari with the accompanying appendix in the case of William Andrew Lee v. The State with the Supreme Court on March 29, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Bryan Ellis with this Court on March 14, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Eugene Hardy with this Court on February 14, 2018.

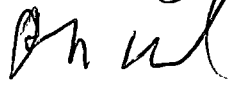
4. Counsel makes this request in good faith and not for purpose of delay.

5. Counsel for the Attorney General's office has been informed of this request.

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

Respectfully submitted,


Joanna K. Delany
Appellate Defender


Robert M. Dudek
Chief Appellate Defender

April 4, 2018

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Appeal from Beaufort County
R. Scott Sprouse, Circuit Court Judge

KELVIN JACKSON,

PETITIONER,

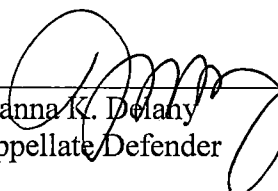
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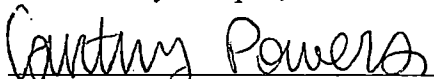
CERTIFICATE OF SERVICE

I certify that a copy of the Motion for an Extension of Time in which to file the petition for writ of certiorari and appendix in the above referenced case has been served upon Christian Saville, Esquire, at the Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, this 4th day of April, 2018.


Joanna K. Delany
Appellate Defender

ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me
This 4th day of April, 2018.

 (L.S.)
Notary Public for South Carolina
My Commission Expires: May 2, 2027.