

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Appeal from Beaufort County

R. Scott Sprouse, Circuit Court Judge

ORIGINAL
RECEIVED
MAY 04 2018
S.C. SUPREME COURT

KELVIN JACKSON,

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 a **final thirty (30) day extension, until June 4, 2018**, 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 are due to be served and filed with the Court today. The Court has granted counsel two previous extensions.
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 consulting and preparing with Chief Appellate Defender, Robert M. Dudek, on the initial brief of appellant and designation of matter in the case of The State v. Jon Smart which she will file today, May 4, 2018, with the Court of Appeals. Counsel is also preparing and consulting with Chief Appellate Defender, Robert M. Dudek, on the petition for writ of certiorari in the cases of Kelvin Jackson v. The State and Laurie Hollis v. The State which she plans to file with this Court in the upcoming weeks. Counsel filed the petition for writ of certiorari with the accompanying appendix in the case of Toshonda Mickens v. The State with this Court on April 9, 2018. Counsel filed the petition for writ of certiorari and the accompanying appendix in the case of Darrell Heyward v. The State with this Court on 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 this 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 the Court of Appeals on March 14, 2018.

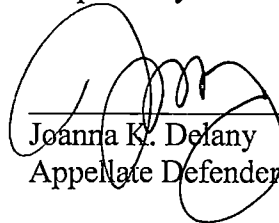
4. Counsel makes this request in good faith and not for purpose of delay.

5. Counsel for the Attorney General's office has been informed of this request as shown by signature below.

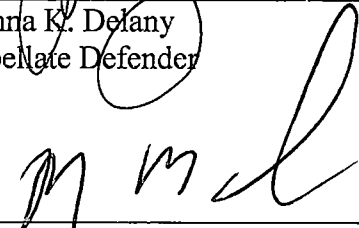
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until June 4, 2018**, in which to file the Petition for Writ of Certiorari and Appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the * be held in abeyance pending a ruling on this motion.

This 4th day of May, 2018.

Respectfully submitted,

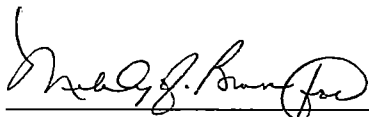


Joanna K. Delany
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

I consent:



Christian Saville, Esquire