

THE STATE OF SOUTH CAROLINA
In The Supreme Court

RECEIVED

APPEAL FROM ANDERSON COUNTY
Court of General Sessions
R. Scott Sprouse, Circuit Court Judge

MAY 22 2018

S.C. SUPREME COURT

Case No. 2017-CP-04-01012

Jerome J. Noone, Jr,..... Petitioner,

v.

State of South Carolina, Respondent.

Petition to Extend Time to File Petition for Writ of *Certiorari* and Appendix

Jerome J. Noone, Jr. petitions this Court to extend the time to file the petition for writ of certiorari and appendix until Friday, June 15, 2018. This is the first request for an extension. This request is based on the follow grounds.

1) Counsel is a solo practitioner with a statewide trial, appellate, and post-conviction practice. In the last 45 days, counsel’s workload has included:

- Filing the initial brief in *J.R. Jones, v. S.C. Republican Party*, appellate case number 2017-002583, an election case expedited by this Court. Counsel expects to file the initial reply brief on Monday, May 21, 2018.
- Filing a petition for rehearing in *Mikal Mahdi v. State*, Appellate Case Number 2017-002212, a capital post-conviction relief case.
- Filing the initial brief in *State v. Ontavious Plumer*, Court of Appeals Appellate Case Number 2017-000481.
- Preparing for and tryinh the evidentiary hearing in *Sammie Lee Gerrick v. State*, Aiken County Case Number 2016-CP-06-00111, involving a murder conviction.

- Filing the petition for rehearing in *State v. Michael Beaty*, Appellate Case Number 2015-000718.
- Counsel is also preparing for a jury trial for the week of May 21, 2018 in *State v. Charles Dent*, Beaufort County Case Numbers 2014-GS-07-01671 to 01674, a first-degree criminal sexual conduct case.

2) After the trial of the Beaufort cases, counsel has designated time to work on this and two other petitions for writs of certiorari in post-conviction relief cases.

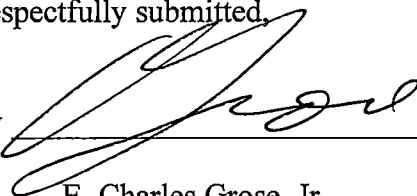
3) This request is not intended for delay, but rather so that counsel can provide effective representation.

Therefore, counsel respectfully requests this Court extend the time to file the petition for writ of certiorari and appendix until Friday, June 15, 2018. Counsel also respectfully request this Court accept this petition out of time as it was mistakenly calendared for May 18, 2018, rather than May 16, 2018.

IT IS SO MOVED.

Respectfully submitted,

By



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Attorney for Jerry Noone

May 18, 2018
Greenwood, South Carolina

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Certificate of Service

I certify that I have served a copy of this pleading on the State of South Carolina by placing a copy in the US Mail, postage prepaid, on the date reflected below, addressed to

Lindsey McCallister, Esquire
S.C. Attorney General's Office
PO Box 11549
Columbia, SC 29211-1549

May 18, 2018



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May 18, 2018

The Honorable Daniel E. Shearouse
Clerk, Supreme Court of South Carolina
P.O. Box 11330
Columbia, SC 29211

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S.C. SUPREME COURT

Re: *Jerome J. Noone, Jr. v. State of South Carolina*
Case No. 2017-CP-04-01012

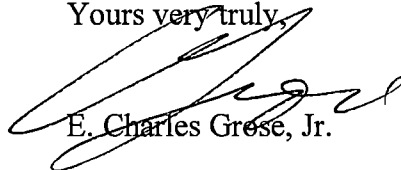
Dear Mr. Shearouse:

Enclosed please find the original and six copies of Mr. Noone's petition to extend time to file the petition for writ of certiorari and appendix, along with a certificate of service.

Thank you for your attention to this matter. If you have any questions or require additional information, please do not hesitate to contact me.

With kindest regards, I am

Yours very truly,



E. Charles Grose, Jr.

cc: Lindsey McCallister, Esquire