

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

---

Appeal from Berkeley County  
Michael G. Nettles, Circuit Court Judge

---

JEFFREY A. MICHAELSON,

V.

THE STATE,

ORIGINAL  
RECEIVED  
JUN 29 2018  
PETITIONER  
SUPREME COURT

RESPONDENT.

APPELLATE CASE NO. 2017-002373

---

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

---

Counsel for Jeffrey A. Michaelson respectfully requests a **final thirty (30) day extension, until July 30, 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 Jeffrey A. Michaelson 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 filed the petition for writ of certiorari with the accompanying appendix in the case of Chavis Aikman v. The State with this Court on June 27, 2018. Counsel filed the petition for writ of certiorari with the accompanying appendix in the case of Leonard Jenkins v. The State with this Court on June 18, 2018. Counsel filed the petition for writ of certiorari with the accompanying appendix in the case of Dominique Cash v. The State with this Court on June 13, 2018. Counsel filed the petition for writ of certiorari with the accompanying appendix in the case of Laurie Hollis v. The State with this Court on June 6, 2018. Counsel filed the petition for writ of certiorari with the accompanying appendix in the case of Kelvin Jackson v. The State with this Court on June 4, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Tappia Green with the Court of Appeals on May 30, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Jon Smart with the Court of Appeals on May 4, 2018. 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.

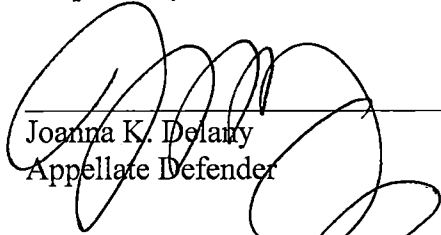
4. Counsel makes this request in good faith and not for purpose of delay.

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 July 30, 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 Petition for Writ of Certiorari and Appendix be held in abeyance pending a ruling on this motion.

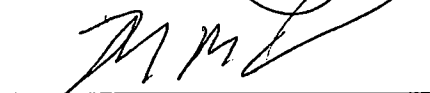
This 29th day of June, 2018.

Respectfully submitted,



---

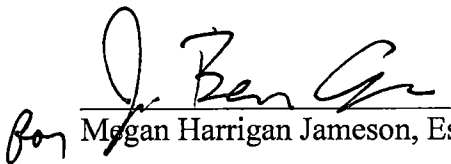
Joanna K. Delany  
Appellate Defender



---

Robert M. Dudek  
Chief Appellate Defender

I consent:



---

Megan Harrigan Jameson, Esquire