

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Spartanburg County
Michael G. Nettles, Circuit Court Judge

JAMIE ANTHONY MAKUPSON,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2018-001377

**PETITION FOR EXTENSION TO FILE
PETITION FOR WRIT OF CERTIORARI
AND APPENDIX**

The undersigned counsel would respectfully request a thirty-day extension in which to file the petition for writ of certiorari and appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following exigent circumstances:

1. The petition for writ of certiorari and appendix in this case are due to be served and filed today, having been extended by one prior order of this Court.
2. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Angela D. Brewer in the Court of Appeals on December 31, 2018. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Brian Z. Morton v. State in this Court on December 27, 2018. Counsel filed the Johnson petition for writ of

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S.C. SUPREME COURT
PETITIONER,

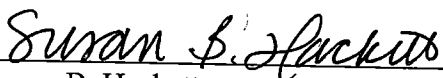
certiorari and accompanying appendix in the case of Donald R. Dollard v. State in this Court on December 17, 2018. Counsel filed a petition for rehearing in the case of State v. Marcus Channing Johnson in the Court of Appeals on December 14, 2018. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Halden Lamont Hollman v. State in this Court on December 12, 2018. Counsel testified during a PCR hearing at the Charleston County Courthouse in the case of Alan L. Burns v. State of South Carolina on December 4, 2018. Counsel had an oral argument in the case of State v. Stacy Carol Riden with the Court of Appeals on December 3, 2018. Counsel was a guest speaker at the 2018-2019 Appellate Practice Project: Presenting Cases to the Appellate Courts seminar on November 30, 2018. Counsel filed the brief of petitioner in the case of Mykel Johnson v. State in the Court of Appeals on November 29, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Demontay Payne in the Court of Appeals on November 26, 2018. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Eric Lamont Owens v. State in this Court on November 26, 2018. Counsel was a guest speaker at the Public Defense 101: Fundamentals of the Profession 101 seminar on November 19, 2018. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Shawn Reaves v. State in this Court on November 14, 2018. Counsel filed the reply brief of petitioner in the case of Eric Darien v. State in this Court on November 9, 2018. Counsel had an oral argument in the case of State v. Michael Scott Simmons with this Court on November 7, 2018

3. This request is made in good faith, and not for purposes of delay.

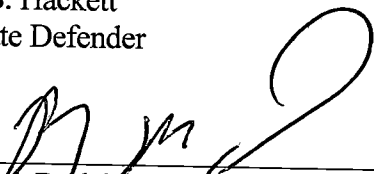
WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension in which to file the petition for writ of certiorari and appendix in this case. Counsel requests that the

time limits for filing the petition for writ of certiorari be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Susan B. Hackett
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

January 2, 2019

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Certiorari to Spartanburg County
Michael G. Nettles, Circuit Court Judge

JAMIE ANTHONY MAKUPSON,

PETITIONER,

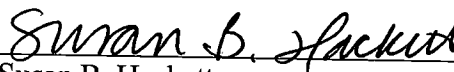
V.

STATE OF SOUTH CAROLINA,

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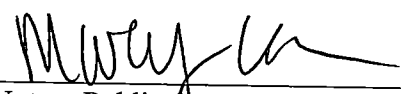
CERTIFICATE OF SERVICE

I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon Jordan Cox, Esquire, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, S.C. 29201 this 2nd day of January, 2019.


Susan B. Hackett
Appellate Defender

ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me
this 2nd day of January, 2019.

 (L.S.)
Notary Public for South Carolina
My Commission Expires: May 12, 2027