

ORIGINAL

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

Appeal from Florence County  
William H. Seals, Jr., Circuit Court Judge

RECEIVED

JAN 28 2013

S.C. Supreme Court

TYQUAN JARED JONES, AMIR,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2012-212303

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

The undersigned counsel respectfully requests a **final thirty-day extension, until February 28, 2013** in which to file the petition for writ of certiorari from the Court of Appeals and accompanying appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

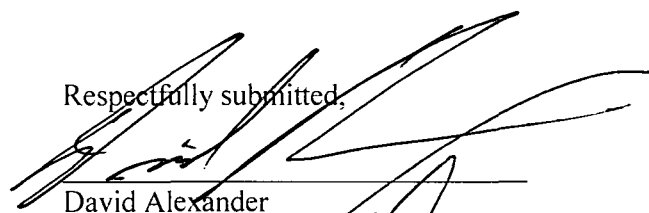
1. The petition for writ of certiorari and accompanying appendix in this case are due to be served and filed today.
2. Counsel is currently working on a **death penalty case** in Marion Bowman v. State. Counsel is also working on the petition for writ of certiorari in Brenda Gail Cutro v. State which has an appendix of over **5,000** pages. On Friday, January 25, 2013, counsel filed the initial brief of appellant and designation of matter in State v. Julian Deandre Battle in the Court of

Appeals. Counsel filed the petition for writ of certiorari in Sterling Green v. State due on Monday, January 21, 2013. On Monday, January 14, 2013, counsel filed the petition for writ of certiorari and accompanying appendix in Heyward Robinson v. State with this Court and the Anders brief of appellant and Record on Appeal in State v. Alfred Jackson in this Court. Counsel had an oral argument in this Court in the case of State v. Robert Jolly on January 10, 2013. Counsel filed the initial brief of appellant and designation of matter with this Court in State v. Henry Lee Felder and the petition for rehearing with the Supreme Court in State v. Danny Cortez Brown on January 3, 2013. Counsel filed the brief of petitioner in State v. James Miller with the Supreme Court on December 28, 2012. The initial brief of appellant and designation of matter in State v. Kevin Bennett were filed in this Court on December 28, 2012. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Ronald Jeffery Shows in this Court on December 19, 2012. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Dayvonn A. Valentine v. State in the Supreme Court on December 17, 2012. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of James Alexander v. State with the Supreme Court on December 12, 2012. Counsel filed the petition for writ of certiorari and accompanying appendix in Ashante Wright v. State with the Supreme Court on December 12, 2012. Counsel filed the reply to return to petition for writ of certiorari in the Supreme Court in Darrell Goss v. State on December 4, 2012.

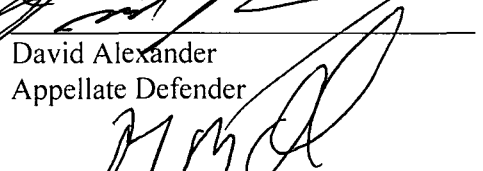
3. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty-day extension, until February 28, 2013**. Counsel respectfully requests that the time limits for filing the petition for writ of certiorari and accompanying appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



David Alexander  
Appellate Defender



Robert M. Dudek  
Chief Appellate Defender

January 28, 2013

I do not oppose:



Tyson Andrew Johnson, Sr.