

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

**ORIGINAL**

\_\_\_\_\_  
Certiorari to York County

Honorable William A. McKinnon, Circuit Court Judge  
\_\_\_\_\_

JASON ALAN JOHNSON,

**RECEIVED**

JUL 10 2019

PETITIONER,

S.C. SUPREME COURT

V.

STATE OF SOUTH CAROLINA

RESPONDENT

APPELLATE CASE NO. 2019-000216  
\_\_\_\_\_

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

Counsel for Jason Alan Johnson respectfully requests an extension of thirty (30) days 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 second 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.
2. Counsel for Jason Alan Johnson 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.

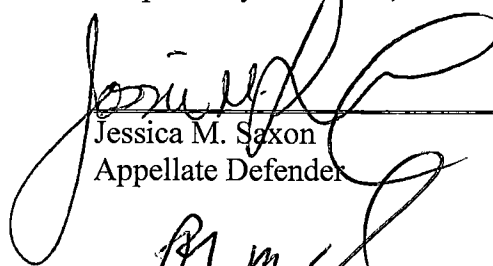
3. Counsel will file the petition for writ of certiorari in the case of David Coon v. The State with this Court on July 12, 2019. Counsel is preparing and consulting with Chief Appellate Defender, Robert M. Dudek, on the petition for writ of certiorari and accompanying appendix in the cases of Samuel Jeter v. The State, and Michael Williams v. The State which she plans to file with this Court in the upcoming weeks.

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.

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 based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Jessica M. Saxon', written over a horizontal line.

Jessica M. Saxon  
Appellate Defender

A handwritten signature in black ink, appearing to read 'Robert M. Dudek', written over a horizontal line.

Robert M. Dudek  
Chief Appellate Defender

July 10, 2019

Attorney for Petitioner

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to York County  
Honorable William A. McKinnon, Circuit Court Judge  
\_\_\_\_\_

JASON ALAN JOHNSON,

PETITIONER,

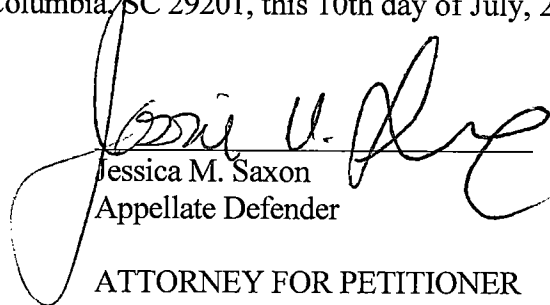
V.

STATE OF SOUTH CAROLINA

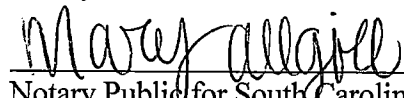
RESPONDENT

\_\_\_\_\_  
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 Janell Gregory, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 10th day of July, 2019.

  
\_\_\_\_\_  
Jessica M. Saxon  
Appellate Defender  
ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 10th day  
of July, 2019.

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