

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

**ORIGINAL**

Appeal from Spartanburg County

Honorable J. Derham Cole, Circuit Court Judge

**RECEIVED**

SEP 03 2019

SC Court of Appeals  
RESPONDENT

THE STATE,

v.

SAMUEL JEREMIAH JETER,

APPELLANT

APPELLATE CASE NO. 2019-000065

MOTION FOR EXTENSION TO FILE  
INITIAL BRIEF OF APPELLANT  
AND DESIGNATION OF MATTER

The undersigned counsel respectfully requests a thirty-day extension in which to file the initial brief of appellant and designation of matter in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The initial brief of appellant and designation of matter in this case are due to be served and filed today.

2. Counsel will file the petition for writ of certiorari in the case of Albert Taylor v. The State today, September 3, 2019 with the Supreme Court. Counsel filed the reply to brief of petitioner in the case of John Willie Mack v. The State on August 15, 2019 with the Court of Appeals. Counsel filed the petition for writ of certiorari in the case of Jason Johnson v. The State on August 9, 2019 with the Supreme Court. Counsel filed the petition for writ of certiorari in the case of David Coon v. The State on July 10, 2019 with the Supreme Court. Counsel is preparing

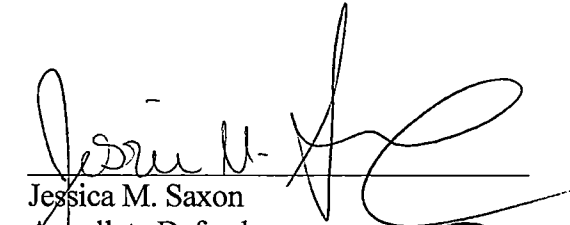
and consulting with Chief Appellate Defender, Robert M. Dudek, on the petition for writ of certiorari and accompanying appendix in the cases of Eric Adams v. The State, and Justin Cone v. The State which she plans to file with the Supreme Court in the upcoming weeks.

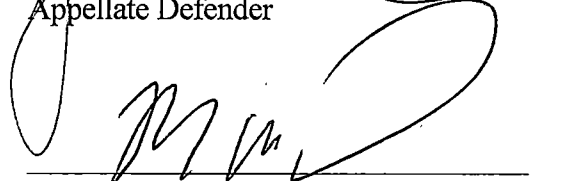
3. This request is made in good faith, and not for purposes of delay.

4. As indicated by his consent below, counsel for the state graciously consents to or does not oppose this request.

WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension. Counsel respectfully requests that the time limits for filing the initial brief of appellant and designation of matter be held in abeyance pending a ruling on this motion.

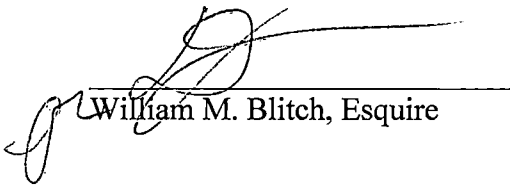
Respectfully submitted,

  
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Jessica M. Saxon  
Appellate Defender

  
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Robert M. Dudek  
Chief Appellate Defender

September 3, 2019

I DO NOT OPPOSE:

  
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William M. Blich, Esquire