

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Beaufort County

Thomas A. Russo, Circuit Court Judge  
\_\_\_\_\_

HAROLD LEE JACKSON,

ORIGINAL  
RECEIVED  
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S.C. SUPREME COURT

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2019-001089  
\_\_\_\_\_

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

The undersigned counsel would respectfully request a **final thirty-day extension, until December 23, 2019**, 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:

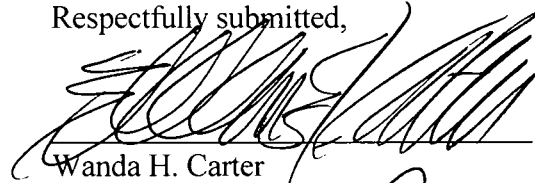
1. The petition for writ of certiorari and appendix in this case are due to be served and filed today, having been extended by two prior orders of this Court.
2. Counsel will file the initial brief of appellant and designation of matter in the case of State v. Derrick Miles in the Court of Appeals today, November 22, 2019. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the

case of Patrick David Vaughn v. State in the Supreme Court on November 15, 2019. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Gowndell Cades v. State in the Supreme Court on November 7, 2019. Counsel had an oral argument in the case of Frederick Robert Chappell v. State in the Supreme Court on November 5, 2019. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Javonte Antonio Walls v. State with the Supreme Court on November 1, 2019. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of Demetrius Simmons v. State with the Supreme Court on October 21, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Sequoia McKinnon v. State with the Supreme Court on October 18, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Kelvin Eugene Cohen v. State with the Supreme Court on October 3, 2019. Counsel filed the brief of respondent in the case of Hubert Brown v. State with the Court of Appeals on September 27, 2019. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of Jermaine Antonio Hodge v. State with the Supreme Court on September 18, 2019. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Edward Stackhouse v. State with the Supreme Court on September 17, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Donetelle D. Cannon v. State with the Supreme Court on September 16, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Troy Darnell Hunter v. State with the Supreme Court on September 3, 2019.

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

WHEREFORE, the undersigned counsel would respectfully request a **final thirty-day extension, until December 23, 2019**, 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,




Wanda H. Carter  
Deputy Chief Appellate Defender



Robert M. Dudek  
Chief Appellate Defender

November 22, 2019

I DO NOT OPPOSE:

  
for Benjamin Limbaugh, Esquire