

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Florence County

William H. Seals, Circuit Court Judge

ROBERT JACKSON,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2019-001497

MOTION FOR AN EXTENSION OF TIME
TO FILE THE PETITION FOR WRIT OF CERTIORARI
AND APPENDIX

Counsel for Robert Jackson 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 Robert Jackson respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of

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extensions previously granted and the order in which counsel attempts to manage her caseload, counsel hopes that no further extension requests will be required.

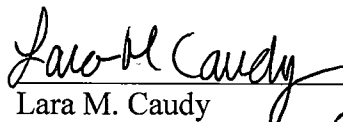
3. On February 21, 2020, counsel filed a petition for writ of certiorari and accompanying appendix in Jabriel Singleton v. The State with the Supreme Court. On February 12, 2020, counsel filed the brief of appellant and designation of matter in The State v. Andre Heatley with the Court of Appeals. On February 3, 2020, counsel filed a petition for writ of certiorari and accompanying appendix in Gussie Henry Hilton v. The State with the Supreme Court. On January 31, 2020, counsel filed the initial brief of appellant and designation of matter in The State v. Robert McCaffrey with the Court of Appeals. On January 28, 2020, counsel, along with Victor Seeger, filed a petition for writ of certiorari to the Court of Appeals in The State v. Jonathan Donell Rhodes with the Supreme Court. On January 23, 2020, counsel filed a petition for rehearing in The State v. Shane Alexander Washington with the Court of Appeals. On January 17, 2020, counsel, along Robert Dudek and David Alexander, filed a petition for writ of certiorari and accompanying appendix in Marion Lindsey v. The State with the Supreme Court. On January 15, 2020, counsel filed the initial brief of appellant and designation of matter in The State v. Marreese Jamaul Fripp with the Court of Appeals. On January 8, 2020, counsel filed the initial brief of appellant and designation of matter in The State v. Charles Bunton with the Court of Appeals. On January 8, 2020, counsel filed the initial brief of appellant and designation of matter in The State v. Filiciano Jermaine Smith with the Court of Appeals. On January 6, 2020, counsel filed the initial brief of appellant and designation of matter in The State v. Tammy Caison Moorner with the Court of Appeals. On December 31, 2019, counsel filed the initial brief of appellant and designation of matter in In the Matter of the Care and Treatment of Antonio Young with the Court of Appeals. On December 16, 2019, counsel filed a petition for

writ of certiorari and accompanying appendix in Tamarus Long v. The State with the Supreme Court.

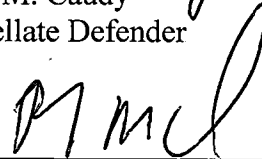
4. Counsel makes this request in good faith and not for purpose of delay.
5. Counsel for the Attorney General's office has been informed of this request.

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 for writ of certiorari and appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Lara M. Caudy
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 25th day of February, 2020.

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Appeal from Florence County

William H. Seals, Circuit Court Judge

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ROBERT JACKSON,

PETITIONER,

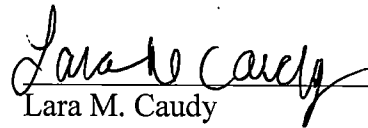
V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

CERTIFICATE OF SERVICE

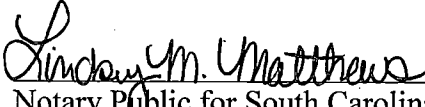
I certify that a copy of the Motion for an Extension of Time in which to file the petition for writ of certiorari and appendix in the above referenced case has been served upon Briana L. Schill, Esquire, at the Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 25th day of February, 2020.



Lara M. Caudy
Appellate Defender

ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me
this 25th day of February, 2020.

 (L.S.)
Notary Public for South Carolina
My Commission Expires: October 22, 2024.