

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

ORIGINAL

Certiorari to Horry County

Robert E. Hood, Circuit Court Judge

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MAR 19 2020

S.C. SUPREME COURT

THE STATE,

RESPONDENT,

v.

JEROME JENKINS, JR.

APPELLANT

APPELLATE CASE NO. 2019-001280

PETITION 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 death penalty case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

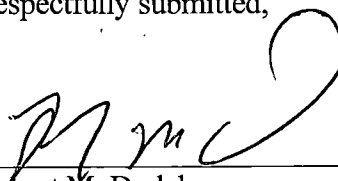
1. The initial brief of appellant and designation of matter in this case are due to be served and filed today, having been extended by one prior order of this Court.
2. Counsel filed the brief of appellant and designation of matter in the case of The State v. Michael Joe Smith with the Court of Appeals on March 6, 2020. Counsel filed the brief of appellant and designation of matter in the case of The State v. Anthony Briggs with the Court of Appeals on February 26, 2020. Counsel filed the petition for writ of certiorari and accompanying

appendix in the case of Arthur Franklin Smith v. The State with this Court on February 18, 2020. Counsel filed the petition for rehearing in the case of The State v. Timiya Rashad Massey with the Court of Appeals on February 13, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Robert Xavier Geter with the Court of Appeals on February 3, 2020. Counsel filed the brief of appellant and designation of matter in the case of The State v. Johnnie Lee McKnight with the Court of Appeals on January 28, 2020. Counsel was co-counsel to Lara M. Caudy and Victor Seeger, when a petition for writ of certiorari to the Court of Appeals and accompanying appendix in The State v. Jonathan Donell Rhodes was filed with this Court on January 28, 2020. Counsel filed the petition for writ of certiorari and accompanying appendices in the death penalty case of Marion Alexander Lindsey v. The State with this Court on January 17, 2020 with co-counsel David Alexander and Lara M. Caudy. Appellate Defenders Kathrine Hudgins and Adam Ruffin are co-counsel on this case. Because this is a capital case undersigned counsel will need to travel to Horry County to view the exhibits in person although he continues to review the vast majority of the exhibits from his office while working on this case. Appellate Defender Hudgins is presently out of the office for precautionary reasons after her daughter returned from overseas this past weekend. **Counsel has extensive administrative duties as the Chief Appellate Defender, including training four less experienced appellate defenders and reviewing all their filings in advance. Counsel also has extensive administrative and Appellate Practice Project oversight responsibilities.**

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 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,

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

Robert M. Dudek
Chief Appellate Defender

Kathrine H. Hudgins
Appellate Defender

Adam Sinclair Ruffin
Appellate Defender

March 19, 2020

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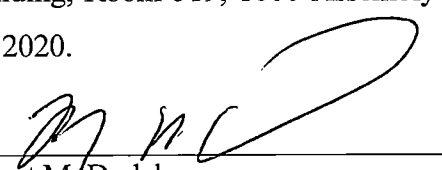
JEROME JENKINS, JR.

APPELLANT

APPELLATE CASE NO. 2019-001280

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true copy of the petition for extension to file the initial brief of appellant and designation of matter in the above referenced case has been served upon Melody J. Brown, Esquire, at Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, this 19th day of March, 2020.



Robert M. Dudek
Chief Appellate Defender

Kathrine H. Hudgins
Appellate Defender

Adam Sinclair Ruffin
Appellate Defender

ATTORNEYS FOR APPELLANT.

SUBSCRIBED AND SWORN TO before me
this 19th day of March, 2020.

 (L.S.)
Notary Public for South Carolina
My Commission Expires: December 31, 2029.