

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Spartanburg County

J. Mark Hayes, II, Circuit Court Judge

RECEIVED

Apr 13 2020

S.C. SUPREME COURT

JEREMY JEROME KNIGHT,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2019-001474

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

The undersigned counsel would respectfully request a **final thirty-day extension, until May 13, 2020**, 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 filed the initial brief of appellant and designation of matter in the case of State v. Devin Jamel Johnson in the Court of Appeals on April 6, 2020. Counsel filed a return to the petition for rehearing in the case of State v. Mykel Johnson in the Court of Appeals on April

1, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Xzariera Okevis Gray in the Court of Appeals on March 30, 2020. Counsel had an oral argument in the case of State v. Lucius Simuel with the Court of Appeals on March 9, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Charles M. Mitchell in the Court of Appeals on March 4, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Gabrielle Oliva Lashane Davis Kocsis in the Court of Appeals on March 4, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Gregory L. Brooks v. State in this Court on February 24, 2020. Counsel filed the brief of petitioner in the case of State v. Fabian Lamichael Green in this Court on February 24, 2020. Counsel filed the petition for rehearing in the case of State v. Emory Warren Roberts in the Court of Appeals on February 13, 2020.

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

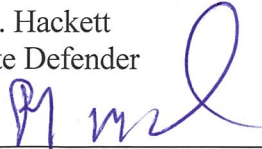
4. Opposing counsel has graciously consented to this extension request. A copy of this request is being served on opposing counsel via e-mail at mjameson@scag.gov.

WHEREFORE, the undersigned counsel respectfully requests a **final thirty-day extension, until May 13, 2020**, 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,

s/Susan B. Hackett

Susan B. Hackett
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

April 13, 2020