

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Horry County

Robert E. Hood, Circuit Court Judge

RECEIVED

May 07 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, from the due date Monday, May 11, 2020 until June 10, 2020**, 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 May 11, 2020. Appellate defenders Kathrine Hudgins and Adam Ruffin are co-counsel on this case, and they have very busy workloads as well.

2. Counsel had a WebEx oral argument before the Court of Appeals on May 5, 2020 in the case of The State v. Howard James Woods, Jr. Counsel filed a petition for writ of certiorari to the Court of Appeals and accompanying appendix in The State v. Edward Primo Bonilla, with this

Court on May 4, 2020. Counsel filed the petition for rehearing in the case of The State v. Justin Jamal Warner with the Court of Appeals on April 22, 2020. Counsel filed the brief of appellant and designation of matter in the case of The State v. Varsheen Antuan Smith with the Court of Appeals on April 21, 2020. Counsel filed the brief of petitioner in the case of The State v. Ahshaad Mykiel Owens with this Court on April 13, 2020. 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 has extensive administrative duties as the Chief Appellate Defender, including management of the work from home coronavirus pandemic situation; administrative and Appellate Project oversight; and training four less experienced appellate defenders and reviewing all of their filings in advance.**

Co-counsel Kathrine Hudgins

Counsel had a WebEx oral argument in the case of The State of South Carolina v. Steven Louis Barnes before the Court of Appeals on May 5, 2020. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of Tommy McGee v. The State of South Carolina with this Court on April 27, 2020. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of Vance Ross v. The State of South Carolina with this Court on April 27, 2020. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of Kelvin Jones v. The State of South Carolina with this Court on April 27, 2020. Counsel filed the Anders brief of appellant and designation of matter in the case of The State of South Carolina v. Jeremy Williams with the Court of Appeals on April 27, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of The State of South Carolina v. Seth Hassan Smith with the Court of Appeals on April 15, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Kerwin Parker v. The State of South

Carolina with this Court on April 8, 2020. Counsel filed the petition for rehearing in the case of Brenda Roberts v. The State of South Carolina with the Court of Appeals on April 2, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of The State of South Carolina v. Byron Rivers with the Court of Appeals on March 31, 2020. Counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of Guadalupe Guzman Morales v. The State of South Carolina with this Court on March 17, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of The State of South Carolina v. Bradford Hester Williams with the Court of Appeals on March 13, 2020. Counsel filed the brief of petitioner in the case of The State of South Carolina v. Jose Reyes with this Court on March 12, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Bilal Sincere Haynesworth v. The State of South Carolina with this Court on March 9, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of The State of South Carolina v. Kelvin Gantt with the Court of Appeals on March 9, 2020.

Co-counsel Adam Ruffin

Counsel filed a Johnson petition for writ of certiorari and accompanying appendix in the case of Kenneth Robinson v. State with this Court on April 13, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Donald Richburg with the Court of Appeals on April 3, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Abdul Furquan v. State with this Court on March 19, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Jermasha Nelson with the Court of Appeals on March 19, 2020. Counsel filed a brief of appellant in the case of State v. Edward Lee Washington with the Court of Appeals on March 4,

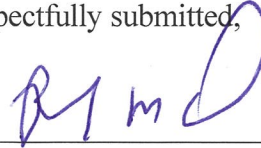
2020. Counsel filed a brief of appellant in the case of State v. Johnny Tyler Padgett in the Court of Appeals on March 4, 2020.

3. Opposing counsel, the Attorney General's Office, has graciously consented to this extension request by way of the thirty-day general consent granted by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through May 21, 2020. That emailed general consent was dated April 21, 2020.

This request of all counsel is made in good faith, and not for purposes of delay. Each attorney intends to continue to work on the cases with more than three extensions first so that their 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, until June 10, 2020**, in which to file the initial brief of appellant and designation of matter. Counsel respectfully requests that the time limits for filing the brief of appellant and designation of matter be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Robert M. Dudek
Chief Appellate Defender

Kathrine Hudgins
Appellate Defender

Adam Sinclair Ruffin
Appellate Defender



J. Hugh Ryan, III
Executive Director/
Hervey B. O. Young
Deputy Director and General Counsel/
W. Lawrence Brown
Deputy General Counsel and Training
Director

This 7th day of May, 2020