

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED
Aug 26 2020
SC Court of Appeals

Appeal from Kershaw County

G. Thomas Cooper, Jr., Circuit Court Judge

THE STATE,

RESPONDENT,

V.

JONATHAN WILLIAM RAY,

APPELLANT

APPELLATE CASE NO. 2019-001743

**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 case. In support of this motion, counsel respectfully shows the Court the following exigent 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 two prior orders of this Court.

2. On August 17, 2020, Counsel filed a response to the state's motion to dismiss in Kinjta Kadeem Sadler v. State in the circuit court. Counsel filed the petition for writ of certiorari in the case of Ronald Hakeem Mack v. State in the Supreme Court on August 12, 2020. On July 31, 2020, Counsel filed a return to the state's motion to strike in State v. Tyreek Dashawn Hayes

in this Court. Previously, Counsel filed the initial brief of appellant and designation of matter in the case of State v. Tyreek Dashawn Hayes in this Court on July 27, 2020. On July 21, 2020, Counsel represented Tunzy Sanders in a hearing on a motion to alter or amend judgment in Sanders v. State before the Honorable Clifton Newman via WebEx video conferencing. Counsel filed a petition for rehearing in the case of State v. Sidney StClair Moorer in this Court on July 16, 2020. Counsel filed the petition for writ of certiorari, the brief of appellant pursuant to White v. State and accompanying appendix in the case of Rodney C. Bryan v. State in the Supreme Court on July 13, 2020. Counsel filed a petition for rehearing in the case of State v. Arthur Jason Bowers in this Court on July 9, 2020. Counsel filed the initial reply brief of appellant in the case of State v. Gabrielle Oliva Lashane Davis Kocsis in this Court on July 2, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Kenneth Lamont Robinson in this Court on June 30, 2020.

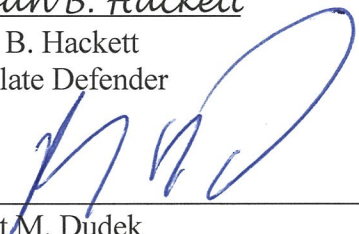
3. This request is made in good faith, and not for purposes of delay.

4. Opposing counsel, for the Attorney General's Office, has graciously consented to this extension request by way of the general consent granted by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through August 31, 2020. That general consent was dated July 30, 2020.

WHEREFORE, the undersigned counsel respectfully requests a thirty-day extension in which to file the initial brief of appellant and designation of matter in this case. Counsel 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,

s/Susan B. Hackett
Susan B. Hackett
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

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CERTIFICATE OF SERVICE

Pursuant to the Supreme Court's Order "RE: Operation of the Appellate Courts During the Coronavirus Emergency," dated March 20, 2020, the undersigned hereby certifies a true copy of the Motion for an Extension of Time in the above-referenced case has been served upon William M. Blich, Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), which is wblitch@scag.gov, this 26th day of August, 2020.

s/Susan B. Hackett

Susan B. Hackett
Appellate Defender

ATTORNEY FOR APPELLANT