

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Spartanburg County

G. Thomas Cooper, Circuit Court Judge

RECEIVED

Oct 16 2020

S.C. SUPREME COURT

RENATA JONES,

RESPONDENT

V.

STATE OF SOUTH CAROLINA,

PETITIONER

APPELLATE CASE NO. 2020-000343

**PETITION FOR EXTENSION TO FILE THE
RETURN TO PETITION FOR WRIT OF CERTIORARI**

The undersigned counsel respectfully requests a **final thirty-day extension, until November 16, 2020**, in which to file the return to petition for writ of certiorari in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following exigent circumstances:

1. The return to petition for writ of certiorari in this case is due to be served and filed today, having been extended by two prior orders of this Court.

2. Counsel filed an initial brief of appellant, designation of matter, in the case of State v. Kayla Marie Cook in the Court of Appeals on October 8, 2020. Counsel filed an anders brief of appellant, designation of matter, and record on appeal in the case of State v. Jason

Simmons in the Court of Appeals on October 6, 2020. Counsel filed an amended initial brief of appellant and designation of matter in the case of State v. Tony Orlanda Singleton in the Court of Appeals on September 30, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Darryl Quan Damond Wilson in the Court of Appeals on September 23, 2020. Counsel attended the Annual Public Defender Conference from September 21-23, 2020. Additionally, counsel presented on the topic of Practical Ethics for the Defense Bar on September 22, 2020, at the Conference. Not only was counsel's attendance at the Conference necessary in light of her presentation, but it was necessary for counsel to obtain her required continuing legal education hours. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Brian Neil White in the Court of Appeals on September 21, 2020. Counsel had an oral argument in the case of State v. Fabian Lamichael Green with this Court on September 16, 2020. Counsel had an oral argument in the case of State v. Demontay Markeith Payne with the Court of Appeals on September 15, 2020. Counsel submitted objections to State's Proposed Order to the circuit court in Tunzy Sanders v. State on September 14, 2020. Counsel filed the Anders brief of appellant and designation of matter in the case of The State v. James Anthony Durham in the Court of Appeals on September 9, 2020. Counsel submitted a proposed order granting the Rule 59(e) motion to the circuit court in Tunzy Sanders v. State on September 4, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Leandra Lamont Bright in the Court of Appeals on September 3, 2020. Counsel filed a response to the Conditional Order of Dismissal in the case of Kinjta Kadeem Sadler v. State on September 2, 2020. Counsel filed a petition for rehearing in the case of State v. Angela Brewer in the Court of Appeals on September 1, 2020. Counsel filed the petition for writ of certiorari in the case of Arthur Jason Bowers v. State in this Court on August 31, 2020. Counsel filed the petition

for writ of certiorari, accompanying appendix, and supplemental appendix in the case of Brittany A. Johnson v. State in this Court on August 31, 2020. Counsel filed the return to petition for writ of certiorari in the case of Rodney Bryan v. State in this Court on August 27, 2020. On August 17, 2020, Counsel filed the response to the state's motion to dismiss in Kinjta Kadeem Sadler v. State in the circuit court. Additionally, on August 17, 2020, Counsel met with counsel for the state and counsel for the co-defendant to discuss logistics for an upcoming reconstruction hearing in State v. Justin Wilson.

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 October 31, 2020. That general consent was dated September 28, 2020.

WHEREFORE, the undersigned counsel respectfully requests a **final thirty-day extension, until November 16, 2020**, in which to file the return to petition for writ of certiorari in this case. Counsel requests that the time limits for filing the return to 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

October 16, 2020