

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Certiorari to Cherokee County
Honorable Robin B. Stilwell, Circuit Court Judge

Case No. 2017-001777

RECEIVED

NOV 09 2020

SC Court of Appeals

PETITIONER,

Alonzo Columbus Jeter, III,

v

STATE OF SOUTH CAROLINA,

RESPONDENT.

MOTION FOR EXTENSION
OF TIME

Petitioner, Alonzo C. Jeter, III, respectfully motions this Court to grant an extension of time to serve and file the appendix and briefs as provided by Rule 243(i), SCACR.

Additionally, out of an abundance of caution, Petitioner seeks that this Court grant an extension of time to serve and file a notice of appeal, objection, or other filing which may be available option to Petitioner whereby he would seek to ensure that this Court is aware of Petitioner's desire to ensure that all issues which were raised in the Petition for Writ of Certiorari are in fact preserved for review. Petitioner does not wish to waive or abandon any issues previously raised and would seek, as soon as possible, to preserve those such issues by submitting appropriate filings to ensure preservation of those such issues; if in fact those such issues would otherwise be lost and considered abandoned were Petitioner to only brief Petitioner's Issue Two wherein the Petition for Writ of Certiorari was granted as the sole issue.

The Petition for a Writ of Certiorari was granted as to Issue

TWO, by way of Order of this Court filed October 19, 2020. Petitioner received a copy of this Order on October 23, 2020, through the Tiger River Correctional Institution's legal mail system.

Extraordinary Circumstances

Petitioner submits as follows in effort to fully provide this Court with cause and necessity for this extension of time.

1. The institution is on a modified schedule due to COVID-19 and safety, social-distancing requirements.
2. The institution's law library recently reopened as of the date of October 19, 2020, after being closed and inaccessible since February 19, 2020.
3. Due to unstableness of institution, shortage of staff, and other related deficiencies within SCOC, there is no set certain date or days that are established whereby Petitioner will be allowed to access the institution's law library.
4. Per a Memorandum issued by the institution dated October 14, 2020, "Inmates will be allowed 60 minutes to conduct research"; however it is not specified how many days per week this access to the law library will be allowed. Petitioner was advised orally by law library staff that this 60 minute access will be limited to one day per week.
5. Per SCOC Policy, GA-01.03 "Inmate Access To The Courts", inmates are restricted from obtaining copies of statutes, case law, rules of court and other material detrimental to an inmate who is in attempt to advance and litigate his legal action. This is a great obstacle which is purely draconian and does create undue hardship upon Petitioner as these such

policies coupled with time restraints with regard of the length of time Petitioner would be allowed to access the institution's law library, the fact that Petitioner is forced to literally write a copy of the rules of court, statutes, and caselaws by hand within this limited time after taking some time to perform searches and research to discover what to handwrite, attempt to learn and comprehend the rules, statutes, and case law, and finally handwrite briefs, motions and other petitions for serving and filing with the Court.

6. Petitioner must reestablish communication with the Division of Appellate Defense so as to reestablish for certain exactly whom Petitioner must directly correspond with at this office for coordinating the services of providing copies of the briefs and appendix. (Order of the South Carolina Supreme Court in this case dated September 21, 2018)

7. The institution is in process of completing maintenance which subjects Petitioner to be relocated within upcoming weeks and any such move or relocating inherently causes Petitioner's litigation, supplies, and other material to become disheveled due to uncontrollable mixture of other inmates belongings.

CONCLUSION

For this reason, out of an abundance of caution, Petitioner respectfully request this Court to Grant a forty-five (45) day extension of time to serve and file the appendix and briefs, and any other filing which would be appropriate for filing to ensure that no issues which were raised within the Petition for Writ of Certiorari be lost or considered abandoned. This motion is not intended for purpose of delay, but is necessitated for good cause.

Respectfully submitted,



Alonzo C. Jeter, III
PETITIONER / pro se

Tyger River Correctional Institution
200 Prison Road
Enoree, South Carolina 29335

This ^{4th} day of November, 2020.



South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS, CLERK
POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211.

Haster

10/19/2020

US POSTAGE

FIRST-CLASS MAIL

\$00.50⁰⁰



ZIP 29201
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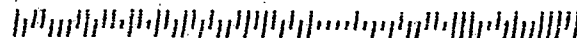
OCT 23 2020

TYRGI MAILROOM

ALONZO C. JETER, III, 282902
TYGER RIVER CORRECTIONAL INSTITUTION
UPPER YARD
200 PRISON ROAD
ENOREE SC 29335-9308

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20213

293359302796 R003



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CERTIFICATE OF SERVICE

I, Alonzo C. Jeter, III, hereby certify that I have served the Motion For Extension of Time, or Responded by placing a copy of the same within a postage prepaid envelope, and placing the same in the hands of Tiger River Correctional Institution's mail room personnel on this 4th day of November, 2020, for mailing via the United States Mail, addressed as follows: V. Henry Gunter, Esquire, Assistant Attorney General, Office of the Attorney General, Post Office Box 11549, Columbia SC 29211-1549; The Honorable Jenny A. Kitchings, SC Court of Appeals, Post Office Box 11629, Columbia SC 29211.

Sworn and Subscribed before me
this 4th day of NOV., 2020,

s/ [Signature]
Alonzo C. Jeter, III
PETITIONER / pro se

[Signature]
Notary Public for South Carolina
My Commission Expires Dec. 10, 2021

Tiger River Correctional Institution,
200 Prison Road
Enoree, South Carolina 29335



SC Code Ann. § 26-1-10 et seq.

Matter of Celsor, 330 SC 497, 499 SE2d 809 (1998)

November 4, 2020

Alonzo C. Jeter, III, #282902
Tyger River Correctional Institution
200 Prison Road
Enoree, South Carolina 29335

The Honorable Jenny Kitchings
Clerk, SC Court of Appeals
Post Office Box 11629
Columbia, SC 29211

RE: Alonzo C. Jeter, III, v State of South Carolina

Appellate Case No. 2017-001777

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NOV 09 2020

SC Court of Appeals

Dear Honorable Clerk:

Enclosed for filing, please find the Motion For Extension Of Time, along with a Certificate of Service for the same.

Please also find, enclosed, one additional copy of these said documents along with a self-addressed stamped envelope. Please return to me, file-stamped copies of these documents by way of the provided SASE.

Thank you for your assistance in this matter.

Sincerely,

Alonzo C. Jeter, III

Alonzo C. Jeter, III #282902
Tiger River Correctional Institution
200 Prison Road
Enoree, South Carolina 29335



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The Honorable Jenny A. Kitchings
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LEGAL MAIL

