

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Horry County

Kristi F. Curtis, Circuit Court Judge

RECEIVED

Nov 30 2020

S.C. SUPREME COURT

JON W. JARRARD,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2020-000675

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

The undersigned counsel respectfully requests a **final thirty-day extension, until December 30, 2020**, in which to file the petition for writ of certiorari and appendix in the above-referenced case. In support of this motion, counsel respectfully shows 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. On November 23, 2020, Counsel presented on the topic of Suppression of Statements at the Public Defense 101: Fundamentals of the Profession Conference. Counsel

filed the return to the petition for writ of certiorari in the case of Renata Jones v. State in this Court on November 12, 2020. Counsel presented on the topic of Ethics in Plea Negotiations on November 6, 2020, at a Webinar entitled Collateral Consequences of Criminal Convictions. Counsel had an oral argument in the case of State v. Robert Miller, III with the Court of Appeals on November 3, 2020. Counsel filed the petition for writ of certiorari in the case of Angela Brewer v. State in this Court on October 29, 2020. Counsel filed the petition for writ of certiorari in the case of Sidney Stclair Moorer v. State in this Court on October 28, 2020. Counsel filed an initial brief of appellant, designation of matter, in the case of State v. Jonathan William Ray in the Court of Appeals on October 26, 2020. Counsel, along with co-counsel, filed the initial brief of appellant and designation of matter in the case of State v. Timothy Ray Jones, Jr. in this Court on October 23, 2020. Counsel filed an initial brief of appellant and designation of matter, in the case of State v. Calvin Ford in the Court of Appeals on October 16, 2020. Counsel filed a petition for rehearing in the case of State v. John William McCarty in the Court of Appeals on October 8, 2020. Counsel filed an initial brief of appellant and 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.

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

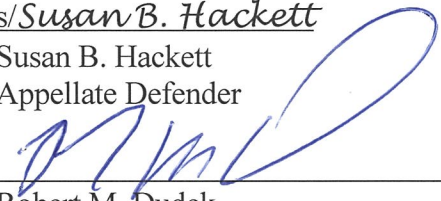
J. Zelenka for all Appellate Defense extensions through November 30, 2020. That general consent was dated October 28, 2020.

WHEREFORE, the undersigned counsel respectfully requests a **final thirty-day extension, until December 30, 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

November 30, 2020