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Dec 04 2020

SC Court of Appeals

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Greenville County  
Honorable Alex Kinlaw, Circuit Court Judge

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THE STATE,

RESPONDENT,

V.

JASON EDWIN STOOTS,

APPELLANT

APPELLATE CASE NO. 2020-000430

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PETITION FOR EXTENSION TO FILE  
INITIAL BRIEF OF APPELLANT AND  
DESIGNATION OF MATTER

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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 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 today.

2. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Johnny Campbell v. The State of South Carolina with the Supreme Court on November 25, 2020. Counsel filed the Initial brief of appellant and designation of matter in the case of The State of South Carolina v. K'Sone Campbell with this Court on November 23, 2020. Counsel

filed the petition for writ of certiorari and accompanying appendix in the case of Richard Schultz v. The State of South Carolina with the Supreme Court on November 9, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Gonzalez Wardlaw v. The State of South Carolina with the Supreme Court on November 9, 2020. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of The State of South Carolina v. Michael Frasier with the Supreme Court on October 21, 2020. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of The State of South Carolina v. Johnathan Green with the Supreme Court on October 21, 2020. Counsel filed the Petition for rehearing in the case of The State of South Carolina v. Heyward Martin with this Court on October 14, 2020. Counsel filed the Initial brief of appellant and designation of matter in the case of The State of South Carolina v. Marissa Cohen with this Court on October 6, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Donte Stokes v. The State of South Carolina with the Supreme Court on October 6, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Ibn Gadson v. The State of South Carolina with the Supreme Court on September 24, 2020. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of Herbie V. Singleton, Jr. v. The State of South Carolina with the Supreme Court on September 23, 2020. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

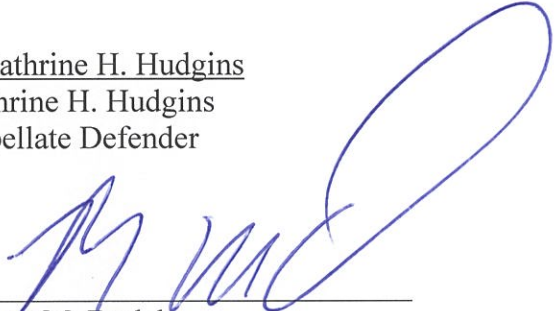
3. Opposing counsel, the Attorney General's Office, has graciously consented to this extension request by way of the thirty day general consent granted by Deputy Attorney General

Donald J. Zelenka for all Appellate Defense extensions through December 31, 2020. That emailed general consent was dated November 25, 2020.

WHEREFORE, the undersigned counsel would respectfully request a thirty day extension. Counsel respectfully 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/ Kathrine H. Hudgins  
Kathrine H. Hudgins  
Appellate Defender



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Robert M. Dudek  
Chief Appellate Defender

This 4<sup>th</sup> day of December, 2020.

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CERTIFICATE OF SERVICE

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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 which to File the Initial Brief of Appellant and Designation of Matter in the above-referenced case have been served upon William M. Blich Jr., Esquire at the primary e-mail address listed in the Attorney Information System (AIS), this 4<sup>th</sup> day of December, 2020.

s/ Kathrine H. Hudgins  
Kathrine H. Hudgins  
Appellate Defender

ATTORNEY FOR APPELLANT