

**RECEIVED**

**Dec 30 2020**

S.C. SUPREME COURT

**THE STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT**

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**Appeal from Horry County  
The Honorable Robert E. Hood, Circuit Court Judge**

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**THE STATE,**

**Respondent,**

**v.**

**JEROME JENKINS, JR.,**

**Petitioner.**

**Appellate Case No. 2019-001280**

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**MOTION FOR FIFTH EXTENSION OF TIME TO FILE  
INITIAL BRIEF OF RESPONDENT AND DESIGNATION OF MATTER**

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Respondent, the State, moves this Court for an additional thirty (30) day extension of time in which to file the Initial Brief of Respondent and Designation of Matter, which is currently due to be filed today, December 30, 2020. Counsel for Petitioner has graciously consented to extension requests through January 31, 2021. This is Respondent's Fifth request for an extension of time in which to file the Brief. In support of the request, undersigned counsel for Respondent would respectfully show unto the Court the following:

1. Counsel has been reviewing matters due to his involvement as Chairman on the Office of the Attorney General's Appellate Decision Review Committee. The Committee was formed to review all adverse decisions in Capital, Federal Habeas, Direct Appeals, and Post-Conviction Relief matters, and to determine whether the State will appeal these rulings. In the last thirty days, counsel has reviewed the following matters: On December 2, 2020, *The State v.*

*Brandon Eaton*, a Laurens County post-conviction relief matter, on December 15, 2020, *The State v. Jason Morris Gourdine*, a Berkeley County post-conviction relief matter; on December 21, 2020, *The State v. Thomas C. Jones*, a Greenville County Criminal Appeals matter;

2. Counsel prepared and filed the Status Report in the case of *The State v. Anthony Woods* on December 7, 2020, a Federal Habeas Corpus case pending in the United States District Court for the District of South Carolina; and

3. Counsel filed the Initial Brief of Respondent in the matter of *The State v. Kenneth Wayne Carlisle*, Appellate Case No. 2019-001702 on December 9, 2020, a murder appeal matter now pending in the South Carolina Court of Appeals; and

4. Counsel completed and filed the Federal Corpus Habeas Return in the case of *The State v. Anthony R. Carter* on December 23, 2020 a case pending in the United States District Court for the District of South Carolina; and

5. Counsel filed the Reply to Return to Petition for a Writ of Certiorari with the South Carolina Supreme Court on December 23, 2020 in the case of *The State v. Javon Dion Gibbs*, Appellate Case No. 2017-001846.

Due to counsel's involvement in these and other matters in state and federal court, counsel is unable to complete the Initial Brief of Respondent and Designation of Matter in this action by the due date prescribed. This request is made in good faith, and not for the purposes of delay. Thus, counsel respectfully requests a thirty (30) day extension of time to allow counsel to complete the Initial Brief of Respondent. This is counsel's second request for additional time to do so.

WHEREFORE, undersigned counsel for Respondent respectfully requests an additional extension of thirty (30) days to complete the Initial Brief of Respondent in this matter.

Respectfully submitted,

ALAN WILSON  
Attorney General

DONALD J. ZELENKA  
Deputy Attorney General

MELODY J. BROWN  
Senior Assistant Deputy Attorney General

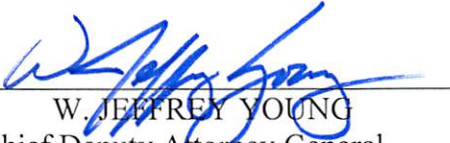
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December 30, 2020.

By: s/ William Edgar Salter, III  
ATTORNEYS FOR RESPONDENT

I too support the finding of good cause.

By:   
W. JEFFREY YOUNG  
Chief Deputy Attorney General