

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Greenville County
Honorable Alex Kinlaw, Circuit Court Judge

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Jan 04 2021

SC Court of Appeals

THE STATE,

RESPONDENT,

V.

JASON EDWIN STOOTS,

APPELLANT

APPELLATE CASE NO. 2020-000430

MOTION FOR AN EXTENSION OF TIME
IN WHICH TO FILE THE INITIAL BRIEF
OF APPELLANT AND DESIGNATION OF MATTER

Counsel for Jason Edwin Stoots respectfully requests a **fourth and final thirty (30) day extension, until February 3, 2021**, in which to file the Initial Brief of Appellant and Designation of Matter in the above-referenced case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. This is a fourth request for an extension. In support of this request, counsel shows:

1. The Initial Brief of Appellant and Designation of Matter in this case are due to be served and filed with the Court today. The Court has granted counsel three previous extensions.
2. Counsel for Jason Edwin Stoots respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the

number of extensions previously granted and the order in which counsel attempts to manage his caseload, counsel hopes that no further extension requests will be required.

3. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Francisco Rodriguez v. The State of South Carolina with the Supreme Court on December 3, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Dequan Vereen v. The State of South Carolina with the Supreme Court on December 3, 2020. 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.

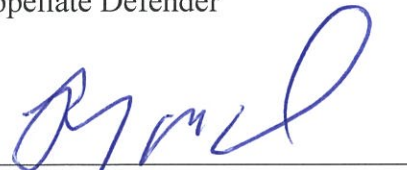
4. Counsel makes this request in good faith and not for purpose of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

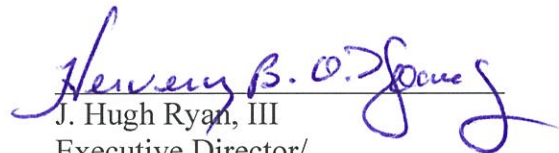
5. Opposing counsel, the Attorney General's Office, has graciously consented to this extension request by way of the thirty day general consent granted by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through January 31, 2021. That emailed general consent was dated December 21, 2020.

WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension, until February 3, 2020**, in which to file the Initial Brief of Appellant and Designation of Matter in this case based upon the above exigent circumstances.

Respectfully submitted,


Kathrine H. Hudgins
Appellate Defender


Robert M. Dudek
Chief Appellate Defender


J. Hugh Ryan, III
Executive Director/
Hervery B. O. Young
Deputy Director and General Counsel/
W. Lawrence Brown
Deputy General Counsel and Training
Director

This 4th day of January, 2021.

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CERTIFICATE OF SERVICE

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 Melody J. Brown, Esquire at the primary e-mail address listed in the Attorney Information System (AIS), this 4th day of January, 2021.


Kathrine H. Hudgins
Appellate Defender

ATTORNEY FOR APPELLANT