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Jan 13 2021

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Beaufort County

Honorable Jocelyn J. Newman, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

JASON J. OWEN,

APPELLANT

APPELLATE CASE NO. 2020-000175

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

Counsel for Jason J. Owen respectfully requests a **fourth and final thirty (30) day extension from Wednesday, January 13, 2021 until February 16, 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. 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, Wednesday, January 13, 2021. The Court has granted counsel three previous extensions.

2. Counsel for Jason J. Owen 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 her 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 Arthur L. Singleton v. The State with the Supreme Court on December 7, 2020. Counsel filed the brief of appellant and designation of matter in the case of The State v. Jamel Dajour Williams with this Court on December 1, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Melvin James White with this Court on November 20, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Genuine Truth Banner v. The State with the Supreme Court on November 6, 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 extended 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 23, 2020.

WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension from Wednesday, January 13, 2021 until February 16, 2021**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances. Counsel 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.

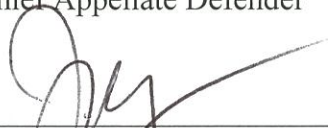
Respectfully submitted,



Sarah Shipe
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 13th 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 initial brief of appellant and designation of matter in the above-referenced case has been served upon William M. Blich, Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), this 13th day of January, 2021.



Sarah E. Shipe
Appellate Defender

ATTORNEY FOR APPELLANT.