

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

---

Certiorari to Pickens County

R. Scott Sprouse, Circuit Court Judge

---

RECEIVED

Oct 04 2021

S.C. SUPREME COURT

JASON ERVIN BLACK,

RESPONDENT-PETITIONER,

V.

STATE OF SOUTH CAROLINA,

PETITIONER-RESPONDENT.

APPELLATE CASE NO. 2021-000525

---

MOTION FOR AN EXTENSION TO FILE  
THE PETITION FOR WRIT OF CERTIORARI  
AND APPENDIX

---

Counsel for Jason Ervin Black respectfully requests a **final thirty (30) day extension, until November 3, 2021**, in which to serve and file the Petition for Writ of Certiorari and Appendix in this case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. This is a third request for an extension. In support of this request, counsel shows:

1. The Petition for Writ of Certiorari and Appendix are due to be served and filed with the Court today.

2. Counsel for Jason Ervin Black 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 initial brief of appellant and designation of matter in The State v. Kevin J. McKinnon with the Court of Appeals on September 27, 2021. On September 15, 2021,

counsel had an oral argument in The State v. Montrelle Lamont Campbell before the Court of Appeals. Counsel filed the Petition for Writ of Certiorari to the Court of Appeals in The State v. Corey Jermaine Brown with the Supreme Court on August 30, 2021. Counsel filed the brief of petitioner in Michael Duran Watson v. The State with the Court of Appeals on August 13, 2021. Counsel filed the brief of appellant and designation of matter in In the Matter of the Care and Treatment of James Ronnie Nichols, Jr with the Court of Appeals on August 11, 2021. Counsel filed the return to petition for writ of certiorari in The State v. M'Andre Cochran with the Supreme Court on August 2, 2021.

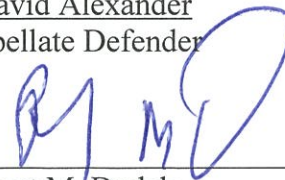
4. Counsel makes this request in good faith and not for purpose of delay.

5. On September 30, 2021, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through October 31, 2021.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until November 3, 2021**, in which to file the Petition for Writ of Certiorari and Appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the Petition for Writ of Certiorari and Appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,

s/David Alexander  
Appellate Defender



---

Robert M. Dudek  
Chief Appellate Defender

This 4th day of October, 2021.