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Oct 18 2021

S.C. SUPREME COURT

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

ON WRIT OF CERTIORARI TO PICKENS COUNTY
Court of Common Pleas
The Honorable John C. Few, Trial Judge
The Honorable R. Scott Sprouse, Post-Conviction Relief Judge

Appellate Case No. 2021-000525

JASON BLACK

RESPONDENT,

v.

STATE OF SOUTH CAROLINA,

PETITIONER.

**MOTION FOR FOURTH EXTENSION TO FILE
PETITION FOR WRIT OF CERTIORARI**

Petitioner, the State, moves this Court for an additional thirty-day extension of time in which to file the petition for writ of certiorari, **up to and including November 17, 2021**. This is the State's fourth request for an extension of time in which to file the petition. In support of the request, undersigned counsel would respectfully show this Court:¹

1. The petition for writ of certiorari is due to be filed with this Court on Monday, October 18, 2021. The Court has granted the State three

¹ In compliance with: *In Re: Extensions in Criminal and Post-Conviction Relief Cases*, (S.C. Sup. Ct. order dated March 18, 2009) (Davis Adv. Sh. No. 13 at 1).

previous extensions.

2. Over the past month, undersigned counsel has represented the State in oral argument before this Court in Michael Elders v. State, (2020-000891).
3. Counsel has submitted proposed orders of dismissal in the Circuit Court for Raphael Pontoo v. State (2018-CP-32-04205) and Joseph Langley v. State (2019-CP-39-0713)
4. Counsel has filed returns and submitted proposed conditional orders of dismissal in the Circuit Court for Frederick Ibry v. State (2017-CP-23-7965); Cardelle Washington v. State (2018-CP-23-1443); Darrel Bishop v. State (2018-CP-23-1444); Martin Marcus v. State (2020-CP-04-1323); and Arthur Young v. State (2018-CP-23-2333).
5. Counsel has filed a return to Applicant's Rule 59(e), SCRCF motion for K.C. Langford v. State (2020-CP-19-0091).
6. Counsel represented the State in the post-conviction relief term held in the 13th Circuit on September 13–17, 2021.
7. Counsel represented the State in an in-person post-conviction relief hearing held today, October 18, 2021, in Anderson, SC.
8. Counsel will be representing the State in the post-conviction relief term starting tomorrow in the 10th Circuit.
9. Greater specificity as to the undersigned's workload can be provided upon request.

10. Counsel for Respondent has graciously consented to this extension request by way of interagency agreement between Appellate Defense and the State.

The undersigned counsel submits this extension request is supported by extraordinary circumstances and is not intended for purposes of delay. The undersigned is currently working on the petition and hopes to have it completed shortly.

THEREFORE, undersigned counsel for the State respectfully requests a **fourth and final thirty-day extension** until **November 17, 2021**, in which to complete and file the petition for writ of certiorari based upon the above exigent circumstances.

Respectfully submitted,

s/LillianMeadows
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**We concur that extraordinary
circumstances have been shown**

s/MeganJameson
MEGAN HARRIGAN JAMESON
Senior Assistant Deputy Attorney General

s/DonaldZelenka
DONALD J. ZELENKA
Deputy Attorney General

This 18th day of October, 2021