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Feb 23 2022

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM ANDERSON COUNTY
Court of General Sessions

R. Lawton McIntosh, Judge

Unpublished Opinion No. 2021-UP-278 (S.C. Ct. App. Filed July 21, 2021)
Court of Appeals Appellate Case Number: 2017-002011

State of South Carolina,

Respondent,

v.

Jason Franklin Appellant,

Petitioner.

APPELLATE CASE NO. 2021-001505

**MOTION FOR EXTENSION OF TIME TO FILE
REPLY TO RESPONDENT'S RETURN TO
PETITION FOR WRIT OF CERTIORARI**

Petitioner Jason Franklin Carver, through his undersigned counsel, hereby respectfully requests an extension of time to work on and file his Petition for rehearing in the above-captioned case.

1. On January 4, 2022, Petitioner filed his Petition for Writ of Certiorari.
2. On February 14, 2022, Respondent filed its Return to the Petition for Writ of Certiorari.
3. Under Rule 242 (g) of the South Carolina Appellate Court Rule (SCACR), Petitioner has ten (10) days from service of Return, or until February 24, 2022, to file his Reply.
4. Respondent has submitted eight (8) issues in its Return, and in order to effectively respond, Petitioner will need a significant time to complete his counter-argument.

5. Due to the complexity of the facts and issues involved in this present case, Petitioner prays for additional time of five (5) days from February 24, 2022, or until March 1, 2022, to file and submit his Reply.

5. Petitioner seeks this extension of time to be able to prepare a cogent and succinct brief to aid this Court in its analysis of the issues presented.

6. This request is not sought for delay but so that justice may be done. Petitioner prays the lack of resulting prejudice to opposing counsel will allow the Court to grant this Motion.

Respectfully submitted by,

s/Donald L. Smith

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Anderson, South Carolina
February 23, 2022.