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S.C. SUPREME COURT

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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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

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Appellate Case No. 2021-000525

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JASON BLACK

RESPONDENT-PETITIONER,

v.

STATE OF SOUTH CAROLINA,

PETITIONER-RESPONDENT.

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

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Petitioner-Respondent, the State, moves this Court for an additional seven-day extension of time in which to file the return to petition for writ of certiorari, **up to and including March 14, 2022**, in the above-captioned cross-appeal. This is the State's fourth request for an extension of time in which to file the return. In support of the request, undersigned counsel would respectfully show this Court:<sup>1</sup>

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<sup>1</sup> 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).

1. The petition for writ of certiorari is due to be filed with this Court today, March 7, 2022. The Court has granted the State three previous extensions.
2. This extension request is not intended for purposes of delay, but rather is due to Counsel's heavy workload and to ensure the return is properly researched and prepared. In the past thirty days, undersigned counsel has:
  - a. Filed a return with the circuit court in *William Marino v. State*, 2021-CP-32-2975, on February 7, 2022;
  - b. Filed the brief of respondent with the Court of Appeals in *Robert Baker v. State*, 2018-001854, on February 14, 2022;  
and
  - c. Filed a return and submitted a proposed conditional order of dismissal to the circuit court in *Troy Burks v. State*, 2018-CP-23-3312, and 2021-CP-23-3840, on February 16, 2022.
3. Counsel is simultaneously preparing for the upcoming post-conviction relief term in the 13th Circuit, to be held March 21–25, 2022, before the Honorable Eugene C. Griffith, Jr.
4. The South Carolina Attorney General's Office's Document Management System was down from Friday, February 18, 2022, until Monday, February 28, 2022, leaving counsel unable to access

her drafts, notes, records, and other documents pertaining to this case during that time.

5. During the afternoon on Sunday, February 27, 2022, counsel sustained a leg and hip injury following a horseback riding accident. She was in the Emergency Room until the following morning. Due to ongoing pain and having to be on strong pain medication, counsel was out of the office from February 28–March 4, 2022.
6. Prior to the accident, counsel was preparing for the post-conviction relief term in the 10th Circuit, which was held February 28–March 4, 2022, before the Honorable William P. Keesley. All of her hearings were ultimately continued.
7. Counsel for Respondent-Petitioner 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 return and hopes to have it completed shortly. The undersigned therefore requests an extension of time within which to serve and file the petition.

THEREFORE, undersigned counsel for the State respectfully requests a **fourth and final seven-day extension** until **March 14, 2022**, in which to

complete and file the return to petition for writ of certiorari based upon the above exigent circumstances.

Respectfully submitted,

s/LillianMeadows  
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Attorney for Petitioner

**We concur that extraordinary  
circumstances have been shown**

s/MeganJameson  
MEGAN HARRIGAN JAMESON  
Senior Assistant Deputy Attorney General

s/DonZelenka  
DONALD J. ZELENKA  
Deputy Attorney General

This 7<sup>th</sup> day of March, 2022.