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Oct 06 2022

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Horry County

Benjamin H. Culbertson, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

TERBIAS JERROD GOFF,

APPELLANT

APPELLATE CASE NO. 2022-000112

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

Counsel for Terbias Jerrod Goff respectfully requests a **fourth and final thirty (30) day extension from October 6, 2022 until November 7, 2022**, in which to serve and 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. This is a fourth request for an extension. 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.
2. Counsel for Terbias Jerrod Goff 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 Pursuant to *Mack v. State* and the Appendix in the case of John Willie Mack, Sr. v. The State with this Court on September 26, 2022. Counsel filed the Petition for Rehearing in the case of Amy N. Taylor v. The State with this Court on September 1, 2022. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Maurice L. Robinson v. The State with the Supreme Court on August 29, 2022. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Odom Bryant v. The State with the Supreme Court on August 22, 2022. Counsel filed the Petition for Rehearing in the case of Justin Ryan Cone v. The State with this Court on August 16, 2022.

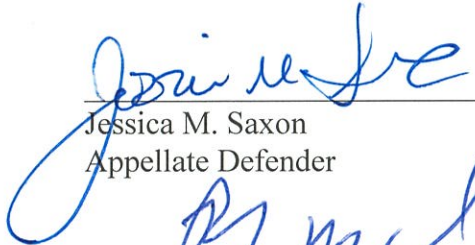
4. Counsel makes this request in good faith and not for purpose of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

5. On September 28, 2022, opposing counsel, the Office of the Attorney General, 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, 2022.

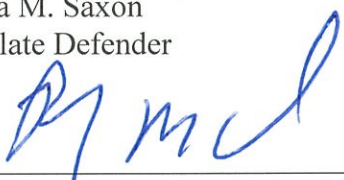
WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension from October 6, 2022 until November 7, 2022**, in which to serve and

file the Initial Brief of Appellant and Designation of Matter in this case based upon the above exigent circumstances.

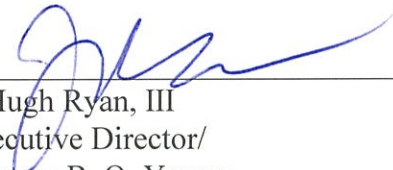
Respectfully submitted,



Jessica M. Saxon
Appellate Defender



Robert M. Dudek
Chief Appellate Defender



J. Hugh Ryan, III
Executive Director/
Hervey B. O. Young
Deputy Director and General Counsel/
W. Lawrence Brown
Deputy General Counsel and Training Director

This 6th day of October, 2022.

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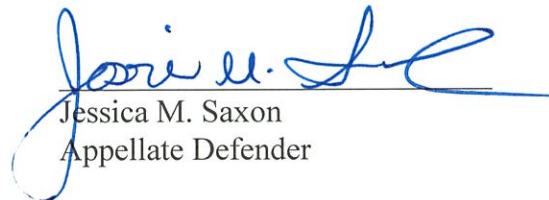
TERBIAS JERROD GOFF,

APPELLANT

APPELLATE CASE NO. 2022-000112

CERTIFICATE OF SERVICE

Pursuant to Rule 262(a)(3) and Rule 262(c)(3), SCACR, the undersigned hereby certifies a true copy of the Motion for Extension in the above-referenced case has been served upon William M. Blich, Jr., Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), this 6th day of October, 2022.



Jessica M. Saxon
Appellate Defender

ATTORNEY FOR APPELLANT

From: [Stock, Chris](#)
To: [SC - BLITCH WILLIAM](#); [SC - COLLINS CAROLINE](#)
Cc: [Saxon, Jessica](#); [Warren, Kaylynn](#)
Subject: 2022-000112 The State v. Terbias Jerrod Goff Fourth Motion for Extension and COS
Date: Thursday, October 6, 2022 9:25:00 AM
Attachments: [2022-000112 The State v. Terbias Jerrod Goff Fourth Motion for Extension and COS.pdf](#)

Mr. Blitch,

Please find attached for service the 4th Request for Extension for Initial Brief of Appellant and Designation of Matter for Terbias Jerrod Goff's appeal which will be filed today with the Court of Appeals.

Thank you.

Chris

Chris Stock
Administrative Assistant
Commission on Indigent Defense
Appellate Division
(803) 734-1330