

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

**RECEIVED**

**Oct 30 2023**

**SC Court of Appeals**

\_\_\_\_\_  
Appeal from Beaufort County

Carmen T. Mullen, Circuit Court Judge  
\_\_\_\_\_

THE STATE,

RESPONDENT,

V.

TERRIO JACQUARD THOMAS,

APPELLANT

APPELLATE CASE NO. 2023-000371  
\_\_\_\_\_

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

Counsel for Terrio Jacquard Thomas respectfully requests a thirty (30) day extension from October 30, 2023 until November 29, 2023 in which to serve and file the Initial Brief of Appellant and Designation of Matter 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 Initial Brief of Appellant and Designation of Matter in this case are due to be served and filed today.

2. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Brittany Pearson v. State with the Supreme Court on October 27, 2023. Counsel filed the Anders

Brief of Appellant and Designation of Matter in the case of The State v. Henry Wayne Parker with the Court of Appeals on October 11, 2023. From October 9, 2023 through October 11, 2023, counsel attended the Annual Public Defender Conference. Counsel filed the Petition for Writ of Certiorari, Brief of Appellant Pursuant to White v. State, and the Appendix in the case of Brian Foster v. State with the Supreme Court on October 3, 2023. Counsel filed the Brief of Petitioner in the case of Raphael L. Pontoo v. The State with the Court of Appeals on September 18, 2023. Counsel filed the Return to the Petition for Rehearing in the case of The State v. Carmie Josette Nelson with the Supreme Court on September 8, 2023. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Narkevious M. Reid with the Court of Appeals on September 6, 2023.

3. This request is made in good faith, and not for purposes 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.

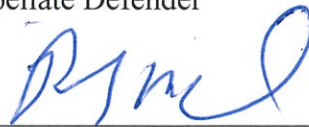
4. On October 3, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through October 31.

WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension from October 30, 2023 until November 29, 2023. Counsel respectfully requests that the time limits for filing the Initial Brief of Appellant and Designation of Matter be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Sarah E. Shipe  
Appellate Defender



Robert M. Dudek  
Chief Appellate Defender

This 30th day of October, 2023.

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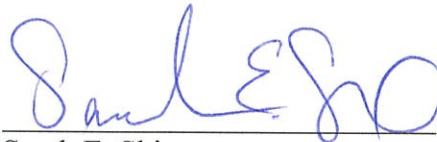
TERRIO JACQUARD THOMAS,

APPELLANT

APPELLATE CASE NO. 2023-000371  
\_\_\_\_\_

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 Mark Farthing, Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), this 30th day of October, 2023.



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Sarah E. Shipe  
Appellate Defender

ATTORNEY FOR APPELLANT