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Feb 15 2024

SC Court of Appeals

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Charleston County

Bentley Price, Circuit Court Judge

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THE STATE,

APPELLANT,

V.

JUAN M. RAMIREZ SANDOVAL,

RESPONDENT

APPELLATE CASE NO. 2023-000590

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

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Counsel for Juan M. Sandoval respectfully requests a **fourth and final thirty (30) day extension until March 18, 2024**, in which to serve and file the Initial Brief of Respondent 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 Respondent and Designation of Matter in this case are due to be served and filed with the Court today.
2. Counsel for Juan M. Sandoval 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. On February 2, 2024, counsel, along with co-counsel, filed a reply in State of South Carolina v. Timothy Ray Jones, Jr. with the United States Supreme Court. On January 24, 2024, counsel filed the initial brief of appellant and designation of matter in The State v. Clayton Thomas Jones with the Court of Appeals. On January 18, 2024, counsel filed an amended application for post-conviction relief in Artrell Hickson v. The State with the Aiken County Clerk of Court. On January 17, 2024, counsel filed the initial brief of appellant and designation of matter in The State v. Reno Blakely with the Court of Appeals. On January 9, 2024, counsel had an oral argument in The State v. Stacardo Grissett before the Supreme Court. On January 8, 2024, counsel filed the petition for writ of certiorari and accompanying appendix in William Funderburke v. The State with the Supreme Court.

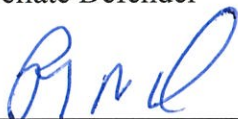
4. Counsel makes this request in good faith and not for purpose of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.


5. On January 31, 2024, 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 February 29, 2024.

WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension until March 18, 2024**, in which to serve and file the Initial Brief of Respondent and Designation of Matter in this case based upon the above exigent circumstances.

Respectfully submitted,

  
\_\_\_\_\_  
Lara M. Caudy  
Appellate Defender

  
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Robert M. Dudek  
Chief Appellate Defender

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

This 15th day of February, 2024.

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APPELLATE CASE NO. 2023-000590

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CERTIFICATE OF SERVICE

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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 Joshua A. Edwards, Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), this 15th day of February, 2024.



Lara M. Caudy  
Appellate Defender

ATTORNEY FOR RESPONDENT

**From:** [Mcinnis, Sara](#)  
**To:** [Josh Edwards](#)  
**Cc:** [Anne Mueller](#); [Caudy, Lara](#)  
**Subject:** 2023-000590 The State v. Juan Sandoval Extension 4  
**Date:** Thursday, February 15, 2024 8:50:00 AM  
**Attachments:** [2023-000590 The State v. Juan Sandoval Extension 4.pdf](#)

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Good Morning Mr. Edwards,

Please find attached for service in the above-referenced case the fourth motion for an extension of time to file the Initial Brief of Respondent and Designation of Matter. This motion will be filed with the Court of Appeals today, February 15, 2024, via email filing.

Thank you!

**Sara McInnis**

Administrative Assistant  
South Carolina Commission on Indigent Defense  
Appellate Division  
(803) 734-1330