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Aug 21 2024

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Anderson County

Honorable R. Lawton McIntosh, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

TERRY DARNELL WASHINGTON,

APPELLANT.

APPELLATE CASE NO. 2024-000292

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

Counsel for appellant respectfully requests a **fourth and final thirty (30) day extension from August 21, 2024, until September 20, 2024**, 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 appellant 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 Anders brief of appellant pursuant to White v. State in the case of The State v. Edward Kik with the Supreme Court on August 12, 2024. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Edward Kirk v. The State with the Supreme Court on August 12, 2024. Counsel filed the Johnson Petition for Writ of Certiorari and Appendix in the case of Demond Derrick Burgess v. The State with the Supreme Court on August 12, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Joyce Stover with the Court of Appeals on August 12, 2023. Counsel filed the Reply Brief of Appellant in the case of The State v. Johnny Haggins with the Court of Appeals on August 9, 2024. Counsel filed the Johnson Petition for Writ of Certiorari and Appendix in the case of Samuel Campbell v. The State with the Supreme Court on July 19, 2024. Counsel filed the Johnson Petition for Writ of Certiorari and Appendix in the case of Kendell A. Gamble v. The State with the Supreme Court on July 19, 2024. Counsel filed the Anders Brief of Appellant and Record on Appeal in the case of The State v. Rekeem L. Ware with the Court of Appeals on July 12, 2024. Counsel filed the Reply Brief of Appellant in the case of The State v. Celia Windham with the Court of Appeals on July 1, 2024. Counsel filed the Reply Brief of Appellant in the case of The State v. Lillian Mae Bates with the Court of Appeals on June 24, 2024. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Larenzoe Epps v. The State with the Supreme Court on June 20, 2024.

4. On July 29, 2024, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy

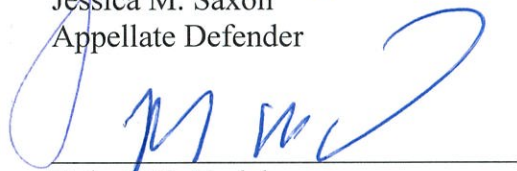
Attorney General Donald J. Zelenka for all Appellate Defense extensions through August 31, 2024.

WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension from August 21, 2024, until September 20, 2024**, in which to serve and file the Initial Brief of Appellant and Designation of Matter in this case based upon the above exigent circumstances.

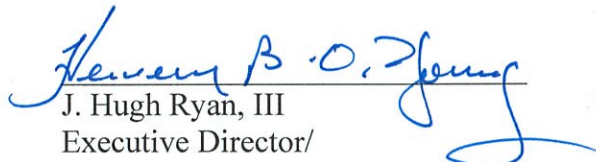
Respectfully submitted,



Jessica M. Saxon
Appellate Defender



Robert M. Dudek
Chief Appellate Defender



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

This 21st day of August, 2024.

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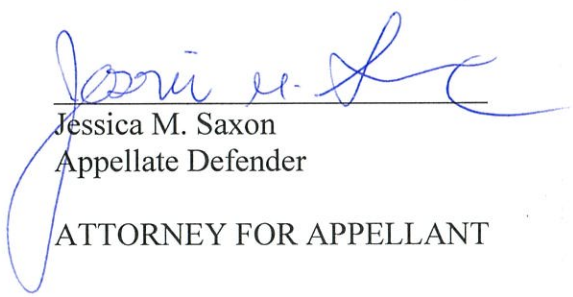
TERRY DARNELL WASHINGTON,

APPELLANT.

APPELLATE CASE NO. 2024-000292

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 Matthew C. Buchanan, Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), this 21st day of August, 2024.



Jessica M. Saxon
Appellate Defender

ATTORNEY FOR APPELLANT

From: [Leverett, Scott](#)
To: [SC - BUCHANAN MATTHEW](#)
Cc: [SC - NICHOLS DAWN](#); [Saxon, Jessica](#)
Subject: 2024-000292 - Washington, Terry - Extension 4
Date: Wednesday, August 21, 2024 10:01:00 AM
Attachments: [2024-000292 - Washington, Terry - Extension 4.pdf](#)

Dear Mr. Buchanan,

Attached please find a copy of the fourth extension in the above referenced case that is being filed today with the Court of Appeals.

-Scott Leverett
Admin. Asst. for Jessica Saxon
Appellate Defense