

RECEIVED

Feb 21 2025

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Greenville County

Perry H. Gravely, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

DAVID C. MOSLEY,

APPELLANT.

APPELLATE CASE NO. 2024-001102

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 thirty (30) day extension, 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 accompanying Appendix in the case of Matthew Pickens v. The State with the Court of Appeals on February 18, 2025. Counsel filed the petition for writ of certiorari and accompanying Appendix in the case of Daeshaun


Forrest v. The State with the Supreme Court on February 7, 2025. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Rico Funderburk with the Court of Appeals on February 7, 2025. Counsel filed the Petition for Rehearing in the case of Holly Thompson v. State with the Court of Appeals on February 5, 2025. Counsel filed the reply to the return to the petition for writ of certiorari in the case of Billy Geisendorff v. State with the Supreme Court on February 6, 2025. Counsel filed the initial reply brief of appellant in the case of The State v. Kyle Mouzon with the Court of Appeals on January 16, 2025. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Akim Jean-Charles with the Court of Appeals on January 3, 2025. Counsel filed the brief of petitioner in the case of Maurice Odom v. State with the Court of Appeals on January 3, 2025. Counsel filed the brief of petitioner in the case of Derrick M. Miller v. State with the Court of Appeals on January 3, 2025. Counsel filed the Johnson Petition for Writ of Certiorari and Appendix in the case of Jaren Meyers v. The State with the Supreme Court on December 23, 2024.

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 her caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.


4. On January 31, 2025, 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 28, 2025.

WHEREFORE, the undersigned counsel would respectfully request a thirty (30) day extension. Counsel respectfully requests that the time limits for serving and filing the Initial Brief of Appellant and Designation of Matter be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Jessica M. Saxon
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 21st day of February, 2025.

RECEIVED

Feb 21 2025

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Greenville County

Perry H. Gravely, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

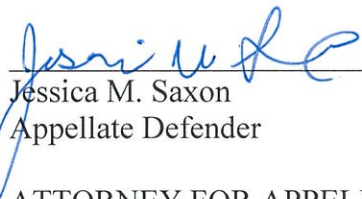
DAVID C. MOSLEY,

APPELLANT.

APPELLATE CASE NO. 2024-001102

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 Melody J. Brown, Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), this 21st day of February, 2025.



Jessica M. Saxon
Appellate Defender
ATTORNEY FOR APPELLANT

From: [Leverett, Scott](#)
To: [SC - BROWN MELODY](#)
Cc: [SC - BROWN ANGELA](#); [Saxon, Jessica](#)
Subject: 2024-001102 - State v. David Mosley - Extension 3
Date: Friday, February 21, 2025 10:27:00 AM
Attachments: 2024-001102 - State v. David Mosley - Extension 3.pdf

Dear Ms. Brown,

Attached please find a copy of the third 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