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Mar 24 2025

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Beaufort County

Carmen T. Mullen, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

TERRANCE WING,

APPELLANT

APPELLATE CASE NO. 2024-000637

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

Counsel for Terrance Wing respectfully requests a **fourth and final thirty (30) day extension from March 24, 2025 until April 23, 2025** 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 Terrance Wing 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.

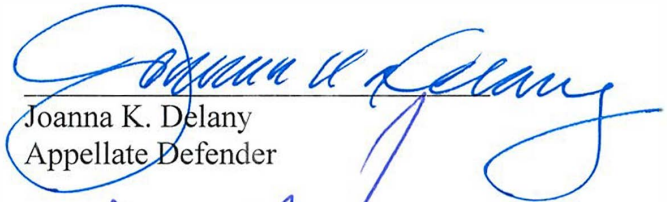
3. Counsel filed the Johnson Petition for Writ of Certiorari and Appendix in the case of Johnny Lee Irby v. State with the Supreme Court on March 12, 2025. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. William A. Kelly with the Court of Appeals on March 5, 2025. Counsel filed the Petition for Writ of Certiorari to the Court of Appeals in the case of The State v. Terry Gridine with the Supreme Court on February 27, 2025. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Natalia Chisolm v. State with the Supreme Court on February 19, 2025. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Nick Evangelista v. State with the Supreme Court on February 14, 2025. Counsel appeared for Oral Argument in the case of In the Interest of Khalid J., A Juvenile Under the Age of Seventeen before the Court of Appeals on February 11, 2025.

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.

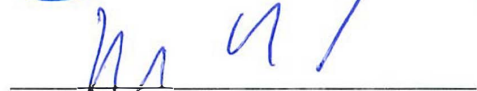
5. On March 3, 2025, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through March 31, 2025.

WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension from March 24, 2025 until April 23, 2025** 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,



Joanna K. Delany
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 24th day of March, 2025.

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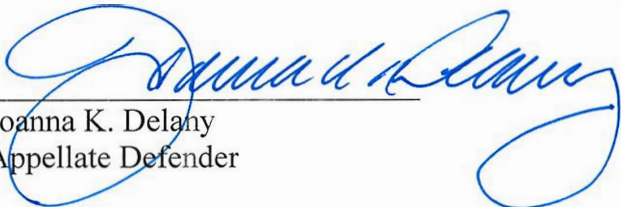
TERRANCE WING,

APPELLANT

APPELLATE CASE NO. 2024-000637

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 24th day of March, 2025.



Joanna K. Delany
Appellate Defender

ATTORNEY FOR APPELLANT

From: [Mcinnis, Sara](#)
To: mbrown@scag.gov
Cc: abennett@scag.gov; [Delany, Joanna](#)
Subject: 2024-000637 The State v. Terrance Wing Extension 4
Date: Monday, March 24, 2025 4:48:00 PM
Attachments: 2024-000637 The State v. Terrance Wing Extension 4.pdf

Good Afternoon Ms. Brown,

Attached for service in the above-referenced case is the fourth motion for extension, which will be filed with the Court of Appeals today, March 24, 2025, via email filing.

Thank you!

Sara McInnis

Administrative Assistant

South Carolina Commission on Indigent Defense

Appellate Division

(803) 734-1330