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S.C. SUPREME COURT

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Charleston County

Honorable Kristi F. Curtis, Circuit Court Judge

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CARLOS A. RUIZ,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2024-001776

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MOTION FOR AN EXTENSION TO SERVE AND FILE  
THE PETITION FOR WRIT OF CERTIORARI  
AND APPENDIX

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Counsel for Carlos A. Ruiz respectfully requests an extension of thirty (30) days in which to file the petition for writ of certiorari and accompanying appendix in this case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. This is a second request for an extension. In support of this request, counsel shows:

1. The petition for writ of certiorari and appendix are due to be served and filed with the Court today.
2. Counsel for Carlos A. Ruiz 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 petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of Vernon Cooley v. The State with the Supreme Court on March 26, 2025. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Kelvin Gantt v. The State with the Supreme Court on March 25, 2025. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Willie James Smith with the Court of Appeals on March 20, 2025. Counsel filed the petition for rehearing in the case of Willie M. Williams v. The State with the Court of Appeals on March 14, 2025. Counsel filed the initial reply brief of appellant in the case of The State v. Micah Pressley with the Court of Appeals on March 13, 2025. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Dean Stevens with the Court of Appeals on March 12, 2025. Counsel had an oral argument in the case of Lindy Lamont Jones v. The State before the Court of Appeals on March 5, 2025. Counsel filed the brief of appellant, designation of matter and supplemental record on appeal in the case of The State v. Mack Gaines with the Court of Appeals on March 3, 2025. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Vernon Cooley with the Court of Appeals on February 25, 2025. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Andre Junior Covington with the Court of Appeals on February 13, 2025. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Brandon Wilson v. The State with the Supreme Court on February 11, 2025. Counsel had an oral argument in the case of Jason Allen Larson v. The State before the Court of Appeals on February 4, 2025. Counsel filed

the Anders brief of appellant, designation of matter and record on appeal in the case of The State v. Earl Valentine with the Court of Appeals on February 3, 2025.

4. Counsel makes this request in good faith and not for purpose of delay.

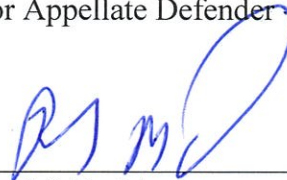
5. Opposing counsel, the Attorney General's Office, has graciously consented to this extension request by way of the thirty-day general consent granted by email from Deputy Attorney General Donald J. Zelenka dated March 31, 2025 for all Appellate Defense extensions through April 30, 2025.

WHEREFORE, the undersigned counsel would respectfully request a thirty (30) day extension in which to serve and file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition for writ of certiorari and appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



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Kathrine H. Hudgins  
Senior Appellate Defender



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Robert M. Dudek  
Chief Appellate Defender

This 3<sup>rd</sup> day of April, 2025.