

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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May 12 2025

S.C. SUPREME COURT

Certiorari to Spartanburg County

Honorable R. Lawton McIntosh, Circuit Court Judge

JAMAL KHALID RIOS,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2025-000005

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

Counsel for Jamal Khalid Rios respectfully requests a **final thirty (30) day extension, from May 12, 2025 until June 11, 2025** in which to serve and file the Petition for Writ of Certiorari and 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 third 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 Jamal Khalid Rios 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.

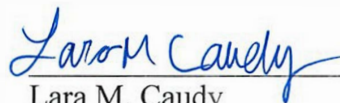
3. On May 12, 2025, counsel filed the petition for writ of certiorari and accompanying appendix in Ishmel Lemon v. The State with the Supreme Court. On May 2, 2025, counsel filed the petition for writ of certiorari and accompanying appendix in Terek Goodwin v. The State with the Supreme Court. On April 30, 2025, counsel, along with co-counsel, filed the initial reply brief of appellant in The State v. Gregory Benjamin with the Court of Appeals. On April 28, 2025, counsel filed the brief of respondent in the Matter of Andy Hyman with the Supreme Court. On April 28, 2025, counsel filed the brief of respondent in the Matter of Shawn Daily with the Supreme Court. On April 25, 2025, counsel, along with co-counsel, filed the petition for writ of certiorari to the Court of Appeals in The State v. Bowen Turner with the Supreme Court. On April 24, 2025, counsel filed the return to the petition for writ of certiorari to the Court of Appeals in Carrol Washington v. The State with the Supreme Court. On April 17, 2025, counsel filed the brief of respondent in Gabriel Rios v. The State with the Court of Appeals. On April 15, 2025, counsel filed the brief of appellant and designation of matter in The State v. Braelon Brown with the Court of Appeals.

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

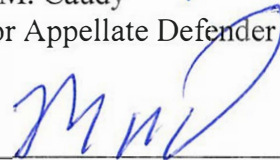
5. On April 30, 2025, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through May 31, 2025.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension from May 12, 2025 until June 11, 2025** 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,



Lara M. Caudy
Senior Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 12th day of May, 2025.