

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED
May 16 2025
SC Court of Appeals

Appeal from Pickens County

Patrick Cleburne Fant, III, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

ROBERT ALLEN HENDERSON, JR.,

APPELLANT.

APPELLATE CASE NO. 2024-001211

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

Counsel for Robert Allen Henderson respectfully requests a **fourth and final thirty (30) day extension from May 16, 2025 until June 16, 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 Robert Allen Henderson 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 appeared for Oral Argument in the case of The State v. Travis Gathers before this Court on Wednesday, May 14, 2025. Counsel filed the Petition for Writ of Certiorari and the Appendix in the case of Matthew Darazs v. The State with the Supreme Court on May 8, 2025. Counsel filed the Brief of Respondent in the case of In the Matter of the Care and Treatment of James L. Williford with the Supreme Court on May 1, 2025. Counsel filed the Brief of Appellant in the case of The State v. Myron Kareem Singleton with this Court on April 23, 2025. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Tashan Carson with this Court on April 16, 2025. Counsel appeared via WebEx to testify at the post-conviction relief evidentiary hearing in the case of Jamal Williams v. The State on April 14, 2025. Counsel appeared for Oral Argument in the case of The State v. Raphael Pontoo before this Court on April 8, 2025. Counsel filed the Petition for Writ of Certiorari, the Petition for Writ of Certiorari Pursuant to *Austin v. State*, and the Appendix in the case of Alonzo Tarrell Jones v. The State with the Supreme Court on March 24, 2025. Counsel filed the Petition for Writ of Certiorari and the Appendix in the case of Diondrae E. Jackson v. The State with the Supreme Court on March 17, 2025. Counsel filed the Petition for Writ of Certiorari and The Appendix in the case of Erick M. Willard v. The State with the Supreme Court on March 13, 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 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 **fourth and final thirty (30) day extension from May 16, 2025 until June 16, 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.

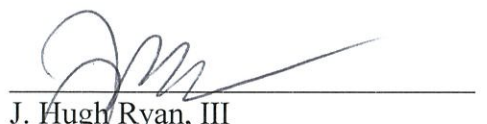
Respectfully submitted,



Sarah E. Shipe
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 16th day of May, 2025.

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THE STATE,

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V.

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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 16th day of May, 2025.



Sarah E. Shipe
Appellate Defender

ATTORNEY FOR APPELLANT