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Jun 30 2025

SC Court of Appeals

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Greenville County

Honorable Alex Kinlaw, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

KRISTOPHER D. BAGWELL,

APPELLANT.

APPELLATE CASE NO. 2024-001279

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 **fourth and final seven (7) day extension from June 30, 2025, until July 7, 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 appellant 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.

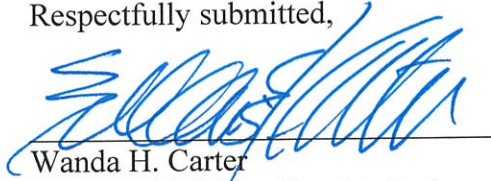
3. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of State v. Michael I. Mobley with the Supreme Court and Court of Appeals on June 23, 2025. Counsel had an oral argument in the case of State v. Jeremy S. Cornish in the Court of Appeals on June 11, 2025. Counsel filed the Anders brief of appellant and record on appeal in the case of State v. Kenneth Mitchell with the Court of Appeals on June 11, 2025. Counsel filed the Anders brief of appellant and record on appeal in the case of State v. Samuel S. Horton with the Court of Appeals on June 9, 2025. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Jonathan Lee Gray with the Court of Appeals on May 30, 2025. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of State v. Shanekia R. Garvin with the Supreme Court on May 19, 2025. Counsel filed the Anders brief of appellant and record on appeal in the case of State v. Derrick L. Tuten with the Court of Appeals on May 12, 2025. Counsel filed the petition for rehearing in the case of State v. Michael Mobley with the Court of Appeals on May 8, 2025. Counsel had an oral argument in the case of State v. Matthew S. Young in the Court of Appeal on April 8, 2025. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Jackie Ray Childers v. State with the Supreme Court on April 4, 2025.

4. On May 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 June 30, 2025.

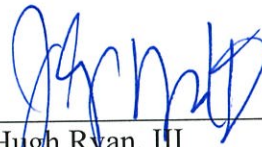
WHEREFORE, the undersigned counsel would respectfully request a **fourth and final seven (7) day extension from June 30, 2025, until July 7, 2025**, in which to serve and file the

Initial Brief of Appellant and Designation of Matter in this case based upon the above exigent circumstances.

Respectfully submitted,



Wanda H. Carter
Deputy 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 30th day of June, 2025.

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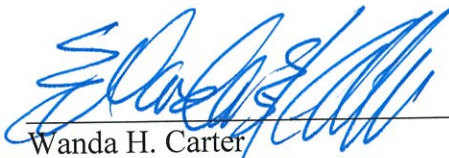
KRISTOPHER D. BAGWELL,

APPELLANT.

APPELLATE CASE NO. 2024-001279

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 Mark R. Farthing, Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), this 30th day of June, 2025.



Wanda H. Carter
Deputy Chief Appellate Defender

ATTORNEY FOR APPELLANT

Leverett, Scott

From: Leverett, Scott
Sent: Monday, June 30, 2025 2:54 PM
To: Mark Farthing
Cc: Caroline Collins; Carter, Wanda
Subject: 2024-001279 - State v. Kristopher D. Bagwell - Extension 4
Attachments: 2024-001279 - State v. Kristopher D. Bagwell - Extension 4.pdf

Dear Mr. Farthing,

Attached please find a copy of the fourth extension in the above referenced case that is being filed today with the Court of Appeals.

-Scott Leverett
Admin. Asst. for Wanda Carter
Appellate Defense