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Jun 30 2025

SC Court of Appeals

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Cherokee County

Honorable R. Keith Kelly, Circuit Court Judge

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THE STATE,

RESPONDENT,

V.

BOBBIE JO BAYNARD,

APPELLANT

APPELLATE CASE NO. 2024-001941

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

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Counsel for Bobbie Jo Baynard respectfully requests a **fourth and final thirty (30) day extension from June 30, 2025, until July 30, 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 Bobbie Jo Baynard 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 his caseload, counsel hopes that no further extension requests will be required.

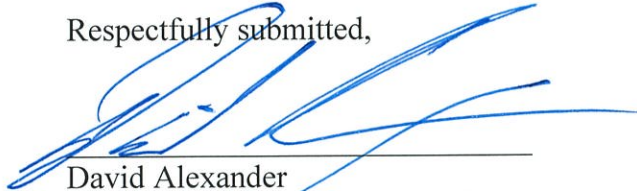
3. Counsel had an oral argument in The State v. Arkevus Jimon Cauthen before the Court of Appeals on June 11, 2025. Counsel filed the Petition for Writ of Certiorari and accompanying Appendix in the case of Dominick Thompson v. The State with the Supreme Court on May 30, 2025. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Courtney Cordae Richards with the Court of Appeals on May 12, 2025. Counsel filed the Petition for Writ of Certiorari and accompanying Appendix in the case of Charles Winston v. The State with the Supreme Court on May 12, 2025. Counsel had an oral argument in Jason Ervin Black v. The State before the Court of Appeals on May 7, 2025. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Timothy P. Spencer with the Court of Appeals on April 4, 2025. Counsel filed the Brief and Record on Appeal in the case of In the Matter of the Care and Treatment of Benjamin Heyward with the Court of Appeals on April 3, 2025. Counsel filed the Brief of Respondent in the case of The State v. Joey Corvell Reid with the Supreme Court on March 21, 2025. Counsel filed the Petition for Writ of Certiorari and accompanying Appendix in the case of Samuel Jolly v. The State with the Supreme Court on March 20, 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.

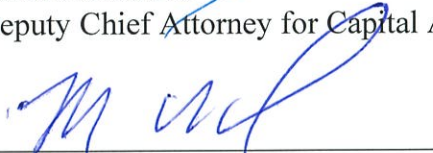
5. On May 30, 2025, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through June 30, 2025.

WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension from June 30, 2025, until July 30, 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,



David Alexander  
Deputy Chief Attorney for Capital Appeals



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 30<sup>th</sup> day of June, 2025.

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APPELLATE CASE NO. 2024-001941

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CERTIFICATE OF SERVICE

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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 30<sup>th</sup> day of June, 2025.



David Alexander  
Deputy Chief Attorney for Capital Appeals

ATTORNEY FOR APPELLANT

**From:** [Stock, Chris](#)  
**To:** [mbrown@scag.gov](mailto:mbrown@scag.gov); [Angela Brown](#)  
**Cc:** [Alexander, David](#)  
**Subject:** 2024-001941 - The State v. Bobbie J. Baynard - 4th Extension Request  
**Date:** Monday, June 30, 2025 9:43:00 AM  
**Attachments:** [2024-001941 - The State v. Bobbie J. Baynard - 4th Extension Request.pdf](#)

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Ms. Brown,

Please find attached for service the 4<sup>th</sup> Extension Request for the Initial Brief of Appellant and Designation of Matter for Bobbie Jo Baynard's appeal which will be filed with the Court of Appeals today.

If you have any questions, please let me know.

Thank you,

**Chris Stock**  
Administrative Coordinator  
Commission on Indigent Defense  
Appellate Division  
(803) 734-1330