

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Spartanburg County

Honorable Eugene C. Griffith, Circuit Court Judge

TERRELL A. BROWN,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2025-000798

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

Counsel for Terrell Brown respectfully requests an extension of thirty (30) days from July 30, 2025 until August 29, 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 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 Terrell Brown respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of

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extensions previously granted and the order in which counsel attempts to manage her caseload, counsel hopes that no further extension requests will be required.

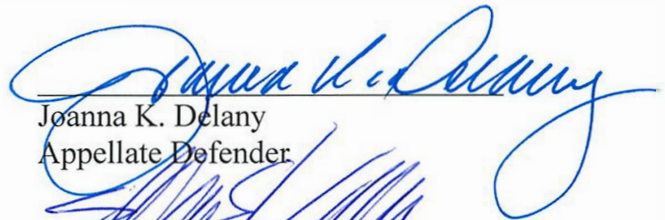
3. Counsel filed the Return to the Petition for Writ of Certiorari to the Court of Appeals in the case of The State v. Quinterris J. Carmichael with the Supreme Court on July 28, 2025. Counsel filed the Brief of Petitioner in the case of The State v. Terry G. Gridine with the Supreme Court on July 24, 2025. Counsel filed the Petition for Rehearing in the case of The State v. Harold G. White, III with the Court of Appeals on July 17, 2025. Counsel filed the *Johnson* Petition for Writ of Certiorari and Appendix in the case of Travis Jessup v. State with the Supreme Court on July 14, 2025. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Marcus C. White with the Court of Appeals on July 9, 2025. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Terrance Wing with the Court of Appeals on June 26, 2025.

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

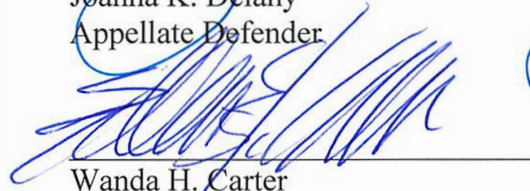
5. On June 27, 2025, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through July 31, 2025.

WHEREFORE, the undersigned counsel would respectfully request a thirty (30) day extension from June 30, 2025 until August 29, 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 serving and filing the Petition for Writ of Certiorari and Appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Joanna K. Delany
Appellate Defender



Wanda H. Carter
Interim Chief Appellate Defender

This 30th day of July, 2025.