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Jul 30 2025

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Cherokee County

R. Keith Kelly, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

EDWARD VINCENT BAYNARD,

APPELLANT

APPELLATE CASE NO. 2024-001912

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

Counsel for Edward Baynard respectfully requests a **fifth and final fourteen (14) day extension from July 30, 2025 until August 13, 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 fifth 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. Previously, by Order dated July 2, 2025, this Court granted a prior extension request

submitted by former Chief Appellate Defender Robert M. Duduk, who was originally assigned to this appeal. Subsequently, the case was assigned to the undersigned counsel, who now requests a two-week extension of time in which to perfect the appeal.

3. Counsel for Edward 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 her caseload, counsel hopes that no further extension requests will be required.

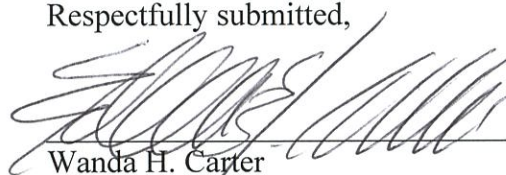
4. Counsel filed the Anders brief of appellant and record on appeal in the case of State v. Travis Young with the Court of Appeals on July 14, 2025. Counsel filed the Anders brief of appellant and record on appeal in the case of State v. Kristopher Bagwell with the Court of Appeals on June 30, 2025. 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 also has extensive administrative duties as the Interim Chief Appellate Defender.**

5. 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.

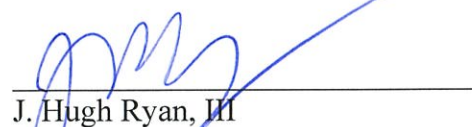
6. On June 27, 2025, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through July 31, 2025.

WHEREFORE, the undersigned counsel would respectfully request a **fifth and final fourteen (14) day extension from July 30, 2025 until August 13, 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
Interim 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 July, 2025.

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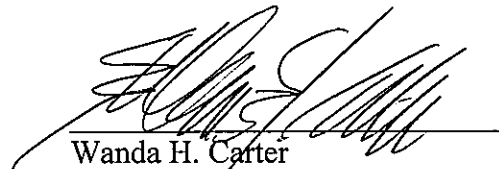
EDWARD VINCENT BAYNARD,

APPELLANT

APPELLATE CASE NO. 2024-001912

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 30th day of July, 2025.



Wanda H. Carter
Interim Chief Appellate Defender

ATTORNEY FOR APPELLANT

Leverett, Scott

From: Leverett, Scott
Sent: Wednesday, July 30, 2025 2:57 PM
To: mbrown@scag.gov
Cc: 'abennett@scag.gov'; Carter, Wanda
Subject: 2024-001912 - State v. Edward V. Baynard - Extension 5
Attachments: 2024-001912 - State v. Edward V. Baynard - Extension 5.pdf

Dear Ms. Brown,

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

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