

RECEIVED

Aug 18 2025

SC Court of Appeals

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Jasper County

Robert J. Bonds, Circuit Court Judge

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THE STATE,

RESPONDENT,

V.

RUBEN RAMIREZ,

APPELLANT

APPELLATE CASE NO. 2025-000372

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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 Ruben Ramirez respectfully requests a thirty (30) day extension from August 18, 2025 until September 17, 2025 in which to serve and file the Initial Brief of Appellant and Designation of Matter in this case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. This is a third 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 today.
2. Counsel filed the Petition for Rehearing in the case of The State v. Devin J. Johnson with the Court of Appeals on August 14, 2025. Counsel filed the *Johnson* Petition for

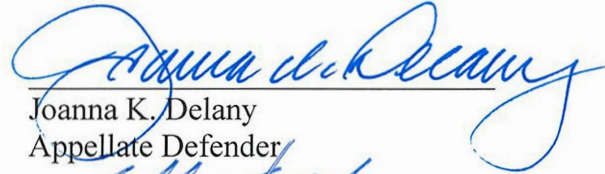
Writ of Certiorari and Appendix in the case of David Eric Hugue, Jr. v. State with the Supreme Court on August 12, 2025. Counsel filed the Petition for Rehearing in the case of The State v. Ray Kelly with the Court of Appeals on July 31, 2025. Counsel filed the Return to the Petition for Writ of Certiorari 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.

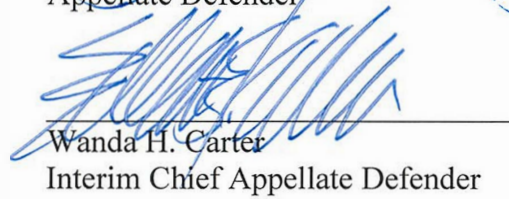
3. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

4. On July 29, 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 August 30, 2025.

WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension from August 18, 2025 until September 18, 2025. Counsel respectfully requests that the time limits for filing the Initial Brief of Appellant and Designation of Matter be held in abeyance pending a ruling on this motion.

Respectfully submitted,

  
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Joanna K. Delany  
Appellate Defender

  
\_\_\_\_\_  
Wanda H. Carter  
Interim Chief Appellate Defender

This 18th day of August, 2025.

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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 Mark R. Farthing, Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), this 18th day of August, 2025.



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Joanna K. Delany  
Appellate Defender

ATTORNEY FOR APPELLANT

**From:** [Mcinnis, Sara](#)  
**To:** [Mark Farthing](#)  
**Cc:** [Caroline Collins](#); [Delany, Joanna](#)  
**Subject:** 2025-000372 The State v. Ruben Ramirez Extension 3  
**Date:** Monday, August 18, 2025 9:25:00 AM  
**Attachments:** 2025-000372 The State v. Ruben Ramirez Extension 3.pdf

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Good Morning Mr. Farthing,

Attached for service in the above-referenced case is the third motion for an extension of time to serve and file the initial brief of appellant and designation of matter. This motion will be filed with the Court of Appeals today, August 18, 2025, via email filing.

Respectfully,

Sara McInnis  
Administrative Assistant  
South Carolina Commission on Indigent Defense  
Appellate Division  
(803) 734-1330