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Aug 22 2025

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Florence County
Honorable H. Steven DeBerry IV, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

TERRELE BAILEY,

APPELLANT

APPELLATE CASE NO. 2024-001755

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

The undersigned counsel respectfully requests a thirty day extension in which to file the initial brief of appellant and designation of matter in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:


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 initial brief of appellant and designation of matter in the case of The State v. Ontario Staley with the Court of Appeals on August 19, 2025. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Levy Ernest Dunn with the Court of Appeals on August 6, 2025. Counsel filed the initial reply brief of appellant in the case of The State v. Melanie McClain with the Court of Appeals on July 29, 2025. Counsel filed the

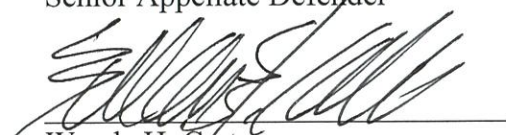
petition for writ of certiorari and accompanying appendix in the case of Willie Ruth Byrd v. The State with the Supreme Court on July 18, 2025. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Maurio D. Rivers v. The State with the Supreme Court on July 18, 2025. Counsel filed the brief of respondent in the case of Joseph Todd Rowland v. The State with the Court of Appeals on June 25, 2025. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Donald Martin, III v. The State with the Supreme Court on June 19, 2025. Counsel filed the reply to return to petition for writ of certiorari to the Court of Appeals in the case of Willie M. Williams v. The State with the Supreme Court on June 17, 2025. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Jeffrey Michael George with the Court of Appeals on May 30, 2025.

3. Opposing counsel, the Attorney General's Office, has graciously consented to this extension request by way of the thirty day general consent granted by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through August 31, 2025. That emailed general consent was dated July 29, 2025.

WHEREFORE, the undersigned counsel would respectfully request a thirty day extension. 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,


Kathrine H. Hudgins
Senior Appellate Defender


Wanda H. Carter
Interim Chief Appellate Defender

This 22nd day of August, 2025.

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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 of time to file initial brief of appellant and designation of matter 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 22nd day of August, 2025.



Kathrine H. Hudgins
Senior Appellate Defender

ATTORNEY FOR APPELLANT

From: [Stock, Chris](#)
To: [Melody Brown](#); [Angela Brown](#)
Cc: [Hudgins, Kathrine](#)
Subject: 2024-001755 - The State v. Terrele R. Bailey - 3rd Extension for Brief and Designation
Date: Friday, August 22, 2025 9:20:00 AM
Attachments: [2024-001755 - The State v. Terrele R. Bailey - 3rd Extension for Brief and Designation.pdf](#)

Ms. Brown,

Please find attached for service the 3rd Extension Request for the Initial Brief of Appellant and Designation of Matter for Terrele Bailey'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