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Sep 02 2025

SC Court of Appeals

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Beaufort County

Diane Schafer Goodstein, Circuit Court Judge

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THE STATE,

RESPONDENT,

V.

ROBERT W. DEJESUS,

APPELLANT

APPELLATE CASE NO. 2024-001891

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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 Robert W. DeJesus respectfully requests a **fourth and final thirty (30) day extension from September 2, 2025 until October 2, 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 Robert W. DeJesus 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.

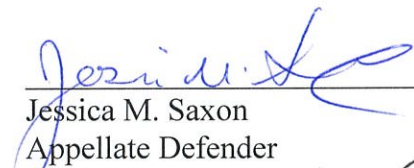
3. Counsel will file the Petition for Writ of Certiorari in the case of Donnell Washington v. The State with the Supreme Court on or before Friday, September 5, 2025. Counsel will file the Reply Brief of Appellant in the case of The State v. Michael Faile with this Court today, September 2, 2025. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Jonathan Keith Bass with this Court on Friday, August 29, 2025. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Michael Valdario with this Court on August 15, 2025. Counsel filed the Return to Petition for Writ of Certiorari to the Court of Appeals in the case of The State v. Tirik Jaquan Johnson-Epps with the Supreme Court on August 7, 2025. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Jason C. Palmer with this Court on July 30, 2025. Counsel filed the Petition for Writ of Certiorari to the Court of Appeals in the case of The State v. Ariel Robinson with the Supreme Court on July 28, 2025. Counsel filed the Return to Petition for Writ of Certiorari the Court of Appeals in the case of The State v. Samir Kevin Shank with the Supreme Court on July 25, 2025. Counsel filed the Petition for Writ of Certiorari and the Appendix in the case of Devonte Anderson v. The State with the Supreme Court on July 18, 2025. Counsel filed the Petition for Writ of Certiorari and the Appendix in the case of Bouvia Sales v. The State with the Supreme Court on July 18, 2025. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. James Curry with this Court on July 7, 2025.

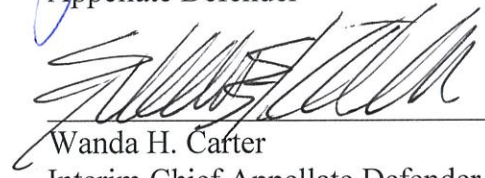
4. Counsel makes this request in good faith and not for purpose of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.


5. On August 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 September 30, 2025.

WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension from September 2, 2025 until October 2, 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,

  
\_\_\_\_\_  
Jessica M. Saxon  
Appellate Defender

  
\_\_\_\_\_  
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 2nd day of September, 2025.

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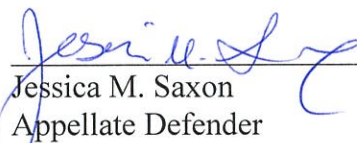
ROBERT W. DEJESUS,

APPELLANT

APPELLATE CASE NO. 2024-001891  
\_\_\_\_\_

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 Mark Farthing, Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), this 2nd day of September, 2025.

  
\_\_\_\_\_  
Jessica M. Saxon  
Appellate Defender

ATTORNEY FOR APPELLANT

## Warren, Kaylynn

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**From:** Warren, Kaylynn  
**Sent:** Tuesday, September 2, 2025 8:20 AM  
**To:** Mark Farthing  
**Cc:** Saxon, Jessica; Caroline Collins  
**Subject:** 2024-001891 The State v. Robert W. DeJesus  
**Attachments:** 2024-001891 The State v. Robert W. DeJesus Fourth Motion for Extension.pdf

Good Morning,

Attached for service in the above-referenced case is the Fourth Motion for Extension which will be filed today, September 2, 2025, with the Court of Appeals via email filing.

Respectfully,

Kaylynn

**Kaylynn Warren**

Administrative Assistant

South Carolina Commission on Indigent Defense

Division of Appellate Defense

(803) 734-1330