

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Charleston County

Honorable Deadra L. Jefferson, Circuit Court Judge

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THE STATE,

RESPONDENT,

V.

CHRISTOVA PIERRE KNOWLIN,

APPELLANT

APPELLATE CASE NO. 2025-000314

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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 Christova Pierre Knowlin 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 this 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 today.
2. Counsel for Christova Pierre Knowlin 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 his caseload, counsel hopes that no further extension requests will be required

3. Counsel filed the Petition for Rehearing in the case of Jason Ervin Black v. The State on August 11, 2025. Counsel was a presenter at a CLE in Columbia on August 9, 2025. Counsel filed the Brief of Appellant and Designation of Matter in the case of The State v. Bobbie Jo Baynard on July 30, 2025. Counsel filed the Brief of Petitioner in the case of In the Matter of the Care and Treatment of Wiley Chapman with the Court of Appeals on July 17, 2025. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Marques Quantez Heath with the Court of Appeals on July 7, 2025. Counsel had an oral argument in The State v. Arkevus Jimon Cauthen before the Court of Appeals on June 11, 2025. Counsel filed the Petition for Writ of Certiorari and accompanying Appendix in the case of Dominick Thompson v. The State with the Supreme Court on May 30, 2025. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Courtney Cordae Richards with the Court of Appeals on May 12, 2025. Counsel filed the Petition for Writ of Certiorari and accompanying Appendix in the case of Charles Winston v. The State with the Supreme Court on May 12, 2025. Counsel had an oral argument in Jason Ervin Black v. The State before the Court of Appeals on May 7, 2025. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Timothy P. Spencer with the Court of Appeals on April 4, 2025. Counsel filed the Brief and Record on Appeal in the case of In the Matter of the Care and Treatment of Benjamin Heyward with the Court of Appeals on April 3, 2025.

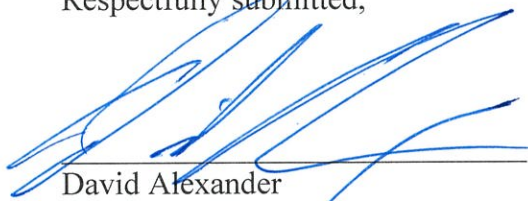
4. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be

requested.

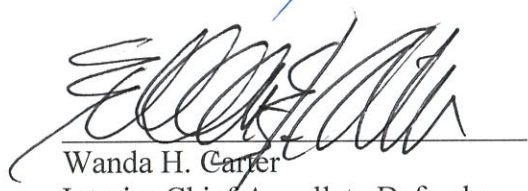
5. On August 27, 2025, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through September 30, 2025.

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



David Alexander  
Deputy Chief Attorney for Capital Appeals



Wanda H. Carter  
Interim Chief Appellate Defender

This 2<sup>nd</sup> day of September, 2025.

**RECEIVED**

**Sep 02 2025**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Charleston County

Honorable Deadra L. Jefferson, Circuit Court Judge

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THE STATE,

RESPONDENT,

V.

CHRISTOVA PIERRE KNOWLIN,

APPELLANT

APPELLATE CASE NO. 2024-001877

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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 2<sup>nd</sup> day of September, 2025.



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David Alexander  
Deputy Chief Attorney for Capital Appeals

ATTORNEY FOR APPELLANT



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**2025-000314 - The State v. Christova Pierre Knowlin - 4th Extension Request**


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**From** Timberlake, Gage <gtimberlake@sccid.sc.gov>

**Date** Tue 9/2/2025 4:39 PM

**To** mfarthing@scag.gov <mfarthing@scag.gov>; ccollins@scag.gov <ccollins@scag.gov>

**Cc** Alexander, David <dalexander@sccid.sc.gov>

 1 attachment (425 KB)

2025-000314 - The State v. Christova Pierre Knowlin - 4th Extension Request.pdf;

Mr. Farthing,

Please find attached for service the 4<sup>th</sup> Extension Request for the Initial Brief of Appellant and Designation of Matter in the matter of the above-referenced case.

Thank you.

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Very Respectfully,

**Gage Timberlake**

Administrative Assistant

Commission on Indigent Defense

Appellate Division

(803) 734-1330