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Sep 17 2025

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Jasper County

Robert J. Bonds, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

RUBEN RAMIREZ,

APPELLANT

APPELLATE CASE NO. 2025-000372

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

Counsel for Ruben Ramirez respectfully requests a **fourth and final thirty (30) day extension** from September 17, 2025 until October 17, 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 Ruben Ramirez 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.

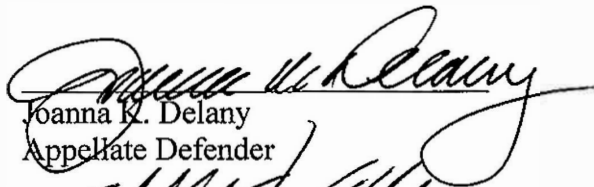
3. Counsel appeared for Oral Argument in the case of The State v. Marvin Bryan before the Court of Appeals on September 11, 2025. Counsel filed the Return to the Petition for Writ of Certiorari to the Court of Appeals in the case of In the Interest of Khalid J., A Juvenile Under the Age of Seventeen with the Supreme Court on August 20, 2025. 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.

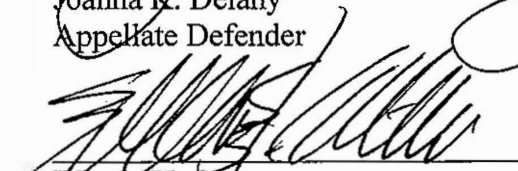
4. Counsel makes this request in good faith and not for purpose of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.


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 17, 2025 until October 17, 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,


Joanna K. Delany
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 17th day of September, 2025.

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Jasper County

Honorable Robert J. Bonds, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

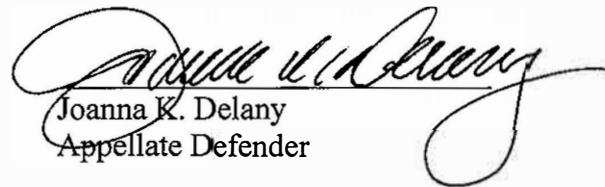
RUBEN RAMIREZ,

APPELLANT

APPELLATE CASE NO. 2025-000372

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 R. Farthing, Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), this 17th day of September, 2025.



Joanna K. Delany
Appellate Defender

ATTORNEY FOR APPELLANT