

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Bamberg County

Honorable Kristi F. Curtis, Circuit Court Judge

KWAMAINE ROSS,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2025-000412

MOTION FOR AN EXTENSION TO SERVE AND FILE
THE PETITION FOR WRIT OF CERTIORARI
AND APPENDIX

Counsel for Kwamaine Jarelle Ross respectfully requests a **final thirty (30) day extension, from September 19, 2025, until October 20, 2025**, in which to serve and file the Petition for Writ of Certiorari and Appendix 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 Petition for Writ of Certiorari and Appendix are due to be served and filed with the Court today.
2. Counsel for Kwamaine Jarelle Ross respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the

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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 Writ of Certiorari to the Court of Appeals and Appendix in the case of The State v. Driscoll Riggins, Jr. with the Supreme Court on September 16, 2025. Counsel filed the Record on Appeal, Final Brief of Appellant, and Proposed Transport Order in the case of The State v. James Brown with the Court of Appeals on September 15, 2025. Counsel filed the Johnson petition for Writ of Certiorari and Appendix in the case of Malik Jabree Singleton v. The State with the Supreme Court on September 11, 2025. Counsel filed the Anders Brief of Appellant, Record on Appeal, and Proposed Transport Order in the case of The State v. Kawasi Lafrance Dingle with the Court of Appeals on September 8, 2025.. Counsel filed the Record on Appeal in the case of The State v. Nazareth N. Sanchez-Peralta with the Court of Appeals on September 5, 2025. Counsel filed the Record on Appeal and Final Brief of Appellant in the case of The State v. Emeric Hamilton with the Court of Appeals on September 2, 2025. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Bryan Jeffrey Ellis v. The State with the Supreme Court on August 28, 2025. Counsel filed the Motion to Reconsider in the case of Trenton M. Barnes v. The State with the Richland County Court on August 21, 2025.

4. Counsel makes this request in good faith and not for purpose of delay.

5. On August 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 September 30, 2025.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension from September 19, 2025, until October 20, 2025**, in which to serve and file the Petition for Writ of Certiorari and Appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the Petition for Writ of Certiorari and Appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Gary H. Johnson
Appellate Defender
SC Bar #8898



Wanda H. Carter
Interim Chief Appellate Defender

This 19th day of September 2025.