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S.C. SUPREME COURT

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Bamberg County

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 FILE
THE PETITION FOR WRIT OF CERTIORARI
AND APPENDIX

Counsel for petitioner respectfully requests a **fourth and final four (4) day extension, until October 24, 2025**, in which to 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 fourth 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. The Court has granted counsel three previous extensions.
2. Counsel for petitioner 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.

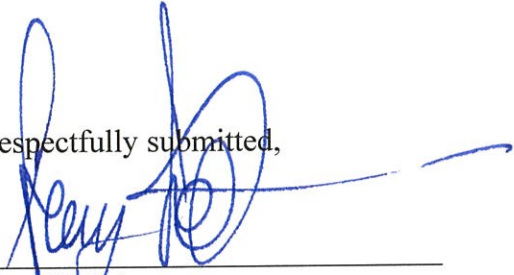
3. Counsel prepared and appeared for Oral Argument in the case of The State v. Jharaun M. Washington with the Court of Appeals on October 16, 2025. Counsel filed the Record on Appeal, Final Brief of Appellant, and Proposed Transport Order in the case of The State v. Nasirea Brewnoplis Jerome Grate with the Court of Appeals on October 13, 2025. Counsel filed the Petition for Rehearing in the case of The State v. Quayshaun Xzander Clark with the Court of Appeals on October 9, 2025. Counsel attended the mandatory Annual South Carolina Public Defender Conference in Myrtle Beach, South Carolina from October 6-8, 2025. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Douglas Kelly Phillips v. The State with the Supreme Court on October 2, 2025. Counsel filed the Final Brief of Appellant and the Final Reply Brief of Appellant in the case of The State v. Nazareth N. Sanchez-Peralta with the Court of Appeals on September 25, 2025. Counsel prepared and appeared for Oral Argument in the case of Andre T. Heatley v. The State with the Supreme Court on September 24, 2025. Counsel filed the Record on Appeal, Proposed Transport Order, and Final Brief of Appellant in the case of The State v. Denardis Jamon Kilgo with the Court of Appeals on September 22, 2025. Counsel filed the Johnson Petition for Writ of Certiorari and Appendix in the case of Kevin L. Middleton v. The State with the Supreme Court on September 17, 2025. 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.

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

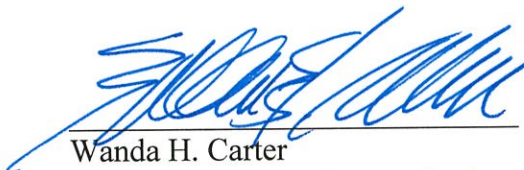
5. On September 25, 2025, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through October 31, 2025.

WHEREFORE, the undersigned counsel would respectfully request a **final four (4) day extension, until October 24, 2025**, in which to 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,

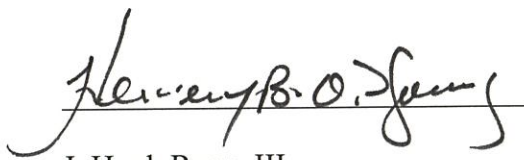


Gary H. Johnson
Appellate Defender



Wanda H. Carter
Interim Chief Appellate Defender

This 20th day of October 2025.



J. Hugh Ryan, III
Executive Director/
Hervey B. O. Young
Deputy Director and General Counsel/
W. Lawrence Brown
Deputy General Counsel and Training
Director