

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

RECEIVED

Nov 10 2025

SC Court of Appeals

---

Appeal from Beaufort County  
The Honorable Carmen T. Mullen, Circuit Court Judge

---

THE STATE,

RESPONDENT,

v.

TERRANCE WING,

APPELLANT.

Appellate Case No. 2024-000637

---

**MOTION FOR FOURTH EXTENSION OF TIME TO FILE  
INITIAL BRIEF OF RESPONDENT AND DESIGNATION OF MATTER**

---

The undersigned counsel would respectfully request a FOURTH and final thirty (30) day extension in which to file the Initial Brief of Respondent and Designation of Matter in the above-referenced case. Counsel for Appellant has graciously consented to extension requests through November 30, 2025. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

Respondent's Initial Brief and Designation of Matter is due to be filed Wednesday, November 12, 2025. The undersigned attorney has had a number of state, and federal matters to attend to since October 10, 2025. Specifically:

1. Counsel filed Replies to Motion to Strike [ECF #60]; Motion to Appoint Counsel [ECF #61]; Motion for Discovery and Expanding the Record [ECF #62]; and Motion to Remand [ECF #63] in the matter of Ben Robert Stewart vs. Warden of Tyger River Correctional Institution, C/A No. 1:25-2909-JFA-SVH on October 10, 2025;

2. Counsel prepared for and presented Oral Argument to the United States Court of Appeals in the Fourth Circuit on October 21, 2025, in the matter of K. C. Langford v. Warden Donnie Stonebreaker, Jr., Warden, Evans Correctional Institution, Case No. 24-7118 (appeal from C/A No. 9:20-cv-01298-DCC);
3. Counsel filed the Respondent's Reply to the Objections to Report and Recommendation [ECF #35] in the matter of Billy Ray Smith vs. Warden, Perry Correctional Institution, C/A No. 1:25-692-CMC-SVH on October 28, 2025;
4. Counsel prepared for and presented Oral Argument at the South Carolina Court of Appeals in the Florence County direct appeal matter of The State vs. Mason Christopher Yarborough, Appellate Case No. 2023-000694 on Tuesday, November 4, 2025;
5. Counsel prepared the Initial Brief of Respondent in the Lee County direct appeal matter of The State v. Stephen J. Green, Appellate Case No. 2024-001684 on November 7, 2025;
6. Counsel is also preparing a Reply to Objection to Report and Recommendation [ECF #43] in the matter of Anthony M. Hudson vs. Warden Tonya James, C/A No. 4:25-cv-2575-JFA-TER. Same will be filed today, November 10, 2025; and
7. Counsel has been involved in working on other matters in state and federal court as well.

Thus, counsel respectfully requests a final thirty (30) day extension of time to allow counsel to complete the Initial Brief of Respondent. This is Respondent's Fourth request for additional time to do so.

WHEREFORE, for the following circumstances, counsel respectfully requests a FOURTH thirty (30) day extension of time to serve and file the Initial Brief of Respondent and Designation of Matter. This request is made in good faith, and not for the purposes of delay. This extension will make Respondent's Initial Brief due on December 12, 2025.

Respectfully Submitted,

ALAN WILSON  
Attorney General

DONALD J. ZELENKA  
Deputy Attorney General

MELODY J. BROWN  
Senior Assistant Deputy Attorney General

R. BRANDON LARRABEE  
Assistant Attorney General  
S.C. Bar No. 104865

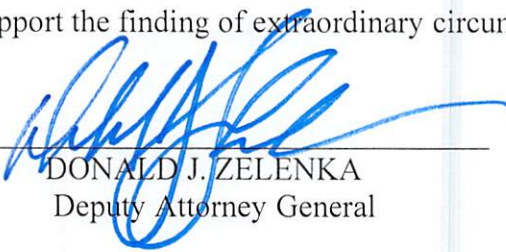
Office of the Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29211-1549  
(803) 734-6305

By: s/R. Brandon Larrabee  
R. BRANDON LARRABEE  
ATTORNEYS FOR RESPONDENT

November 10, 2025.

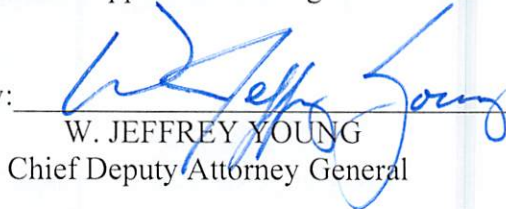
I support the finding of extraordinary circumstances.

By:

  
DONALD J. ZELENKA  
Deputy Attorney General

I further support the finding of extraordinary circumstances.

By:

  
W. JEFFREY YOUNG  
Chief Deputy Attorney General

**RECEIVED**

**Nov 10 2025**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

---

Appeal from Beaufort County  
The Honorable Carmen T. Mullen, Circuit Court Judge

---

THE STATE,

RESPONDENT,

v.

TERRANCE WING,

APPELLANT.

Appellate Case No. 2024-000637

---

**PROOF OF SERVICE**

---

I, **R. Brandon Larrabee**, of counsel for the Respondent, hereby certify that pursuant to Rule 262(c)(3), SCACR and the Supreme Court Order of April 24, 2024, the Fourth Extension of Time to File Initial Brief of Respondent and Designation of Matter has been forwarded to Appellant's counsel, Joanna K. Delany, Esq., via email today, November 10, 2025 to [jdelany@sccid.sc.gov](mailto:jdelany@sccid.sc.gov) and to her assistant at [smcinnis@sccid.sc.gov](mailto:smcinnis@sccid.sc.gov).

I further certify that all parties required by Rule to be served have been served.

This 10<sup>th</sup> day of November, 2025.

*s/ R. Brandon Larrabee*

R. Brandon Larrabee,  
Assistant Attorney General  
Office of the Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29211-1549  
(803) 734-6305