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Nov 13 2025

S.C. SUPREME COURT

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Saluda County

Honorable David P. Caraker, Jr, Circuit Court Judge

ROBERT GOODWIN,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2025-001125

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

Counsel for Robert Goodwin respectfully requests an extension of thirty (30) days 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 second 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 Robert Goodwin 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.

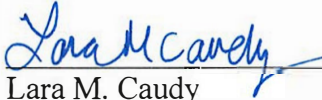
3. On November 12, 2025, counsel had an oral argument in The State v. Juan Ramirez Sandoval before the Court of Appeals. On November 6, 2025, counsel filed the initial brief of respondent and designation of matter in The State v. Joshua Brookins with the Court of Appeals. On October 16, 2025, counsel had an oral argument in The State v. Jejauncey Harrington before the Court of Appeals. From October 6-8, 2025, counsel attended the Annual Public Defender Conference in Myrtle Beach. On September 30, 2025, counsel filed the petition for writ of certiorari and accompanying appendix in Lorenzo Young v. The State with the Supreme Court. On September 24, 2025, counsel had an oral argument in The State v. Kierin Dennis before the Supreme Court. On September 5, 2025, counsel filed the brief of appellant and designation of matter in In Re The Care and Treatment of George Pierson with the Court of Appeals. On August 29, 2025, counsel filed the brief of appellant and designation of matter in The State v. Kahmil Cooper with the Court of Appeals. On August 28, 2025, counsel filed the initial brief of appellant and designation of matter in The State v. James Boatwright with the Court of Appeals.

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

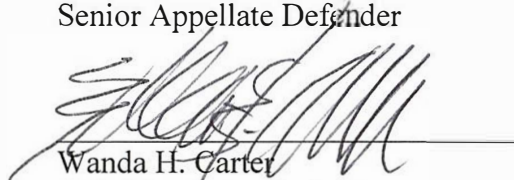
5. On October 31, 2025, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through November 30, 2025.

WHEREFORE, the undersigned counsel would respectfully request a thirty (30) day extension 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 serving and filing the Petition for Writ of Certiorari and Appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Lara M. Caudy
Senior Appellate Defender



Wanda H. Carter
Chief Appellate Defender

This 13th day of November, 2025.