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SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of General Sessions

Roger M. Young, Sr., Circuit Court

Judge

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Case No. 2023GS1003220-3222

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State of South Carolina, Respondent,

v.

Michael Whitlock, Appellant.

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MOTION FOR EXTENSION OF TIME TO FILE  
INITIAL BRIEF AND DESIGNATION OF  
MATERIALS FOR RECORD ON APPEAL

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NOW COMES Appellant, by and through his undersigned counsel, moving for a 30-day extension of time to file the Appellant's initial brief in the above-captioned case. In support of this motion, the Appellant shows as follows:

1. The Appellant's initial brief and designation of material on appeal is currently due today, December 2, 2025. The court has previously granted two 30-day extensions.
2. The appeal is from a conviction for murder, and there was a multi-day trial, resulting in a large volume of documents and a transcript totaling approximately 1000 pages. Counsel has identified numerous potential issues in the transcript and is in the process of fully researching those issues so that they may be briefed in full.
3. Further, since the last extension, the undersigned has received numerous trial documents from trial counsel and is still evaluating them.
3. The Defendant has requested that counsel visit him in prison to go over all of the trial documents and transcripts, including those recently received, so that he may participate in the selection and focus of his appellate arguments.
4. In addition to this case, counsel has had numerous other deadlines in the past month, with several jury trials which were scheduled and had to be prepared for, although two were

postposed and one settled before trial. Further, undersigned counsel must prepare for another appeal before this court which also involves an attempted murder and mass shooting, and that case also has a transcript that is roughly 1,000 pages long as well, as well as voluminous trial documents and exhibits.

5. For these reasons, the undersigned respectfully requests an extension of time in order to meet with the Appellant and properly evaluate the large volume of material, including recently obtained materials, for appellate arguments that may be briefed.
6. The undersigned counsel's schedule for this month is much more open than in the past two months and he does not anticipate having to request any additional extensions, which he understands would be governed by the extraordinary circumstances standard.

WHEREFORE, the Appellant respectfully requests that this Court enter an order extending the deadline for filing the Appellant's initial brief and designation of material for record by 30 days, up to and including the 2<sup>th</sup> day of January, 2026.

/s/ Ryan McKaig  
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