

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
Court of General Sessions

Heath P. Taylor, Circuit Court Judge

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Case No. 2025-000484

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State of South Carolina,

Respondent,

v.

Jaquan L. King,

Appellant.

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MOTION FOR EXTENSION OF TIME TO FILE  
INITIAL BRIEF AND DESIGNATION OF RECORD  
MATERIAL

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NOW COMES Appellant, by and through his undersigned counsel, moving for a final 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 transcript was delivered on August 8, 2025 and the initial brief was due Monday, September 8, 2025. The court granted a second 30-day extension, and ultimately granted a third, making the appellant's brief and the designation of materials for record on appeal due today, December 8, 2025.
2. The appeal is from a conviction for attempted murder, and there was a multi-day trial, resulting in a large volume of documents and a transcript totaling 996 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. In addition to this case, the undersigned counsel, Ryan McKaig, has had numerous other deadlines recently, including 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 voluminous trial documents and exhibits. In addition, one counsel has had to prepare an appeal before the Fourth Circuit and both counsel have had an unusual number of deadlines and appearances in recent weeks.

4. For these reasons, the undersigned respectfully requests an extension of time in order to fully evaluate and brief the issues in this case.
5. The undersigned recognizes that, three extensions having been given, it is necessary to demonstrate extraordinary circumstances and assurances must be made that no further such extensions will be necessary.
6. The undersigned had expected to have the brief finished by today's deadline, but has been ill for the past week and has not been able to finish the brief on time. However, the next three weeks do not contain many pending deadlines, and the undersigned should have no problem completing this brief during that time.
7. The undersigned has reached out to Assistant Attorney General Mark Farthing, representing the State in this case, and he has graciously consented to the undersigned's motion.

WHEREFORE, the Appellant respectfully requests that this Court enter an order extending the deadline for filing the Appellant's initial brief by 30 days, up to and including the 7<sup>th</sup> day of January, 2026.

November 8, 2025

s/ Ryan McKaig  
s/Aaron Wallace  
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