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Dec 15 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

**MOTION TO FILE INITIAL BRIEF OF
RESPONDENT OUT OF TIME**

Respondent, the State, moves this Court to accept the Initial Brief of Respondent in this case as filed out of time:

1. Respondent's Initial Brief was due to be served on Friday, December 12, 2025. Due to other business in state and federal court and the multiplicity of issues in this case, counsel underestimated the schedule for completion.
2. Respondent has prepared the Initial Brief of Respondent and is conditionally filing same with this motion for acceptance and filing if this Court grants this motion.

WHEREFORE, undersigned counsel for Respondent requests the Court accept the Initial Brief of Respondent as filed and served out of time in this case.

Respectfully submitted,

s/ R. Brandon Larrabee

R. Brandon Larrabee

Assistant Attorney General

S.C. Bar # 104865

Office of the Attorney General

Post Office Box 11549

Columbia, South Carolina 29211

(803) 734-6305

ATTORNEY FOR RESPONDENT

This 15th day of December, 2025.

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PROOF OF SERVICE

I, **R. Brandon Larrabee**, of counsel for the Respondent, hereby certify that I have served the Motion to File Out of Time the Initial Brief of Respondent, on Appellant's counsel, Joanna K. Delany, Esq. via email today, December 15, 2025 to jdelany@sccid.sc.gov, and to her assistant at smcinnis@sccid.sc.gov.

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

This 15th day of December, 2025.

s/ R. Brandon Larrabee

R. BRANDON LARRABEE

Assistant Attorney General

S.C. Bar # 104865

Office of the Attorney General

Post Office Box 11549

Columbia, South Carolina 29211

(803) 734-6305

ATTORNEY FOR RESPONDENT

From: [Brandon Larrabee](#)
To: jdelany@sccid.sc.gov; [Mcinnis, Sara](#)
Cc: [Donna D'Alessio](#)
Subject: Terrance Wing - Initial Brief of Respondent, Designation of Matter, Proof of Service, and Motion to File Out of Time - December 15, 2025
Date: Monday, December 15, 2025 11:57:00 PM
Attachments: [Terrance Wing IBOR.pdf](#)
[Terrance Wing Motion to File IBOR Out of Time.pdf](#)
[Terrance Wing Designation of Matter.pdf](#)
[Terrance Wing Proof of Service.pdf](#)
[image001.png](#)

Good evening –

Please see the attached Initial Brief of Respondent, Designation of Matter, Proof of Service, and Motion to File Out of Time in the matter of Terrance Wing. It will be sent to the Court shortly for filing.

Thank you!

Kind regards,

R. BRANDON LARRABEE, Assistant Attorney General
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