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S.C. SUPREME COURT

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to McCormick County

Honorable David P. Caraker, Jr, Circuit Court Judge

JOE ROSS WORLEY,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2025-000928

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

Counsel for Joe Ross Worley respectfully requests an extension of thirty (30) days from January 7, 2026 until February 6, 2026 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 Joe Ross Worley 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. Today, January 7, 2026, counsel filed the petition for rehearing in The State v. Trevor Irvin with the Court of Appeals. On January 2, 2026, counsel filed the petition for writ of certiorari and accompanying appendix in Robert Goodwin v. The State with the Supreme Court. On December 16, 2025, counsel had an oral argument in In the Matter of Andy Hyman before the Supreme Court. On December 9, 2025, counsel had an oral argument in The State v. Che L. Ransom, Jr. before the Court of Appeals. On December 1, 2025, counsel filed the initial brief of appellant and designation of matter in The State v. Mark T. Frick with the Court of Appeals. 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.

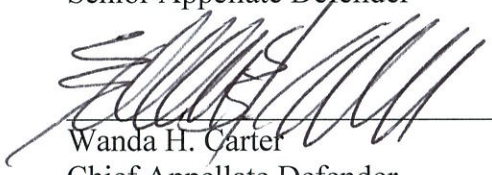
4. Counsel makes this request in good faith and not for purpose of delay.

5. On January 2, 2026, 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 February 1, 2026.

WHEREFORE, the undersigned counsel would respectfully request a thirty (30) day extension from January 7, 2026 until February 6, 2026 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 7th day of January, 2026.