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Feb 05 2026

SC Court of Appeals

STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Sumter County
The Honorable Clifton Newman, Circuit Court Judge

THE STATE,

Respondent,

v.

TRAVON DERRELL RAGIN,

Appellant.

Appellate Case No. 2025-000444

**MOTION FOR THIRD EXTENSION OF TIME TO FILE
INITIAL BRIEF OF RESPONDENT AND
DESIGNATION OF MATTER**

The undersigned counsel would respectfully request a third thirty (30) day extension in which to file the Initial Brief of Respondent in the above-referenced case. Opposing counsel, Kathrine H. Hudgins, Esq., Appellate Defender has consented to extension requests through March 1, 2026. In support of this motion, counsel would respectfully show the Court the following:

Respondent's Initial Brief is due today, Thursday, February 5, 2026. The undersigned attorney has had a number of state and federal matters to attend since January 6, 2026. Specifically,

1. Counsel prepared the Reply to Petitioner's Objections to the Report and Recommendation in the matter of Ben Robert Stewart vs. Warden of Tyger River Correctional Institution, C/A No.: 1:25-2909-JFA-SVH on January 6, 2026;
2. Counsel prepared the Initial Brief of Respondent in the matter of The State vs. Gene Alexander Scott, a Chester County direct appeal matter now pending in the South Carolina Court of Appeals on Wednesday, January 14, 2026;
3. Counsel prepared and filed a Notice of Appeal in the Sumter County capital matter of Bobby Wayne Stone, #5051 vs. State of South Carolina, C/A No. 2018-CP-43-01025 on January 20, 2026;
4. Counsel filed the Return and Memorandum of Law in Support of Motion for Summary Judgment in the matter of Chevis Morris, #352985 vs. Warden, Allendale Correctional Institution, C/A No. 2:25-12367-DCN-MGB, also on January 20, 2026;
5. Counsel prepared a Reply to Response in Opposition to Motion for Summary Judgment [ECF #39] in the matter of Eddie Jerome Motts vs. Warden of Evans Correctional Institution, C/A No. 8:25-5046-JD-WSB on January 21, 2026;
6. Counsel filed the Respondent's Reply to Response in Opposition to Motion for Summary Judgment [ECF #32] in the matter of Nicholas A. Bonner vs. Warden Curtis Early, C/A No. 8:25-11154-DCN-WSB on January 22, 2026;
7. Counsel filed the Respondent's Response to Motion to Appoint Counsel [ECF #48] in the matter of Dashon Garner vs. Warden Broad River Correctional Institution, C/A No. 6:22-03126-TMC-KFM, also on January 22, 2026;
8. Counsel has had a family event requiring his attention of out State; and
9. Counsel has been involved in working on other matters in state and federal court as well.

Due to counsel's involvement in these and other matters pending in state and federal court, counsel for Respondent moves this Court to enlarge the time for filing the response by granting a thirty (30) day extension up to and including March 9, 2026. This request is made in good faith, and not for the purpose of delay.

WHEREFORE, for good cause shown, counsel respectfully requests a thirty (30) day extension of time to serve and file the Initial Brief of Respondent and Designation of Matter. This request is made in good faith, and not for the purposes of delay.

Respectfully submitted,

ALAN WILSON
Attorney General

DONALD J. ZELENKA
Deputy Attorney General

MELODY J. BROWN
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By: s/ R. Brandon Larrabee
R. BRANDON LARRABEE
ATTORNEYS FOR RESPONDENT

February 5, 2026.

I support the finding of good cause.

By: 
MELODY J. BROWN,
Senior Assistant Deputy Attorney General

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PROOF OF SERVICE

I, **R. Brandon Larrabee**, counsel for Respondent, hereby certify that pursuant to Rule 262(c)(3), SCACR and the Supreme Court order of April 24, 2024, the Third extension of time to file the Initial Brief of Respondent has been forwarded to Appellant's counsel, Kathrine H. Hudgins, Esq., via email today, February 5, 2026 to KHudgins@sccid.sc.gov, and to her assistant cstock@sccid.sc.gov

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

This 5th day of February, 2026.

s/ R. Brandon Larrabee
Assistant Attorney General