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Mar 09 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 FOURTH EXTENSION OF TIME TO FILE
INITIAL BRIEF OF RESPONDENT AND
DESIGNATION OF MATTER**

The undersigned counsel would respectfully request a fourth 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 April 1, 2026. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

Respondent's Initial Brief is due today, Monday, March 9, 2026. The undersigned attorney has had a number of state and federal matters to attend since February 6, 2026. Specifically,

1. Counsel filed the Respondent's Reply to Objections to Report and Recommendation [ECF #84] in the matter of Ben Robert Stewart vs. Warden of Tyger River Correctional Institution, C/A No. 1:25-2909-JFA-SVH on February 9, 2026;
2. Counsel also filed the Respondent's Reply to Objections to Report and Recommendation [ECF #74] in the matter of Theodore J. Bolick, a/k/a Theodore Jerry Bolick vs. Donnie Stonebreaker, C/A No. 5:24-7662-MGL-KDW on February 9, 2026;
3. Counsel appeared for oral argument in the Dorchester County direct appeal matter of The State vs. Jason Barry Bell, Appellate Case No. 2023-001326 on February 12, 2026 before the South Carolina Court of Appeals;
4. Counsel filed the Respondent's Response in Opposition to Petitioner's Motion to Amend [ECF #42] in the matter of Eddie Jerome Motts vs. Warden of Evans Correctional Institution, C/A No. 8:25-5046-JD-WSB on February 13, 2026;
5. Counsel filed the Return and Memorandum of Law in Support of Motion for Summary Judgment in the matter of Dashon Garner vs. Warden Broad River Correctional, C/A No. 6:22-03126-TMC-KFM on February 20, 2026;
6. Counsel filed the Joint Status report in the capital federal habeas matter of Bobby Wayne Stone vs. Bryan P. Stirling, et al., C/A No. 2:17-01221-MGL-MGB on March 2, 2026;
7. Counsel appeared before the South Carolina Court of Appeals for oral argument in the Richland County, direct appeal matter of The State vs. Jamira U. Davis, Appellate Case No. 2023-001215 on Tuesday, March 3, 2026; and
8. 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 April 8, 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
Senior Assistant Deputy Attorney General

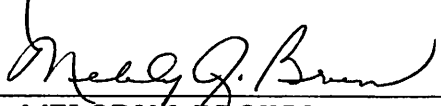
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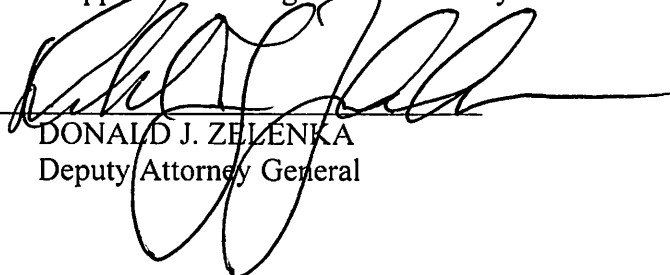
March 9, 2026.

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

I support the finding of extraordinary circumstances.

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

I further support the finding of extraordinary circumstances.

By: 
DONALD J. ZELENKA
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 Fourth extension of time to file the Initial Brief of Respondent has been forwarded to Appellant's counsel, Kathrine H. Hudgins, Esq., via email today, March 9, 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 9th day of March, 2026.

s/ R. Brandon Larrabee
Assistant Attorney General