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Mar 18 2026

SC Court of Appeals

STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Marion County
The Honorable Michael Nettles, Circuit Court Judge

THE STATE,

Respondent,

v.

TERRY ALLEN PAIGE, JR.,

Appellant.

Appellate Case No. 2025-001075

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

Undersigned counsel would respectfully request a thirty (30) day extension up to and including April 20, 2026, in which to serve and file the Initial Brief of Respondent and Designation of Matter in the above-referenced case. Opposing counsel had graciously consented to all extensions through April 1, 2026. In support of this motion, counsel would respectfully show the Court the following:

Respondent's Initial Brief and Designation of matter are due March 19, 2026, pursuant to this Court's Order dated February 19, 2026. Counsel for Respondent has not been able to complete the initial brief within the allotted time due to other state and federal matters including:

1. Counsel has been intensively working up the State's position in the direct appeal matter of *State v. Zachary David Hughes*, App. Case No. 2025-000367, in which the Appellant has raised 12 appealable issues in an 88-page brief. The matter is currently on an additional 30-day extension before this Court following the filing of Appellant's Amended Initial Brief on March 11, 2026;
2. Counsel has also assisted another unit attorney with various PCR matters, including filing a Return to Petition for Writ of Certiorari in *Jeffery Lamont Sanders v. State*, App. Case No. 000550 on February 9, 2026—as well as drafting motions, proposed orders, and attending status conferences in the circuit court matter of *Michael Lawson Schmidt v. State*, (2020-CP-10-01047);
3. Counsel is also currently preparing for a motion hearing on March 27, 2026 in Dorchester in the matter of *Michael Lawson Schmidt v. State*, (2020-CP-10-1047), a Post Conviction Relief Matter;
4. Finally, Counsel has prepared for filing the State's Motion for Summary Judgment & Return and Memorandum of Law in Support of Motion for Summary Judgment in the matter of *Mark Antonio Earls, Jr. v. Warden Shane Jackson*, C/A No. 5:25-cv-13206-SAL-KDW, currently on first extension due March 30, 2026.

For all the above reasons, Respondent is requesting a thirty (30) day extension of time in which to complete briefing in the captioned murder direct appeal.

This request is made in good faith, and not for the purpose of simple delay.

Respectfully Submitted,

ALAN WILSON
Attorney General

DONALD J. ZELENKA

Deputy Attorney General

MELODY J. BROWN
Senior Assistant Deputy Attorney General

P. SANDERS LINKER
Assistant Attorney General

Post Office Box 11549
Columbia, South Carolina 29211
(803) 734-6305

By: s/P. Sanders Linker
P. SANDERS LINKER
ATTORNEYS FOR RESPONDENT

March 18, 2026.

I support the finding of good cause.

By: 
MELODY J. BROWN
Senior Assistant Deputy Attorney General

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PROOF OF SERVICE

The undersigned certifies that pursuant to Rule 262(c)(3), SCACR and the Supreme Court order of April 24, 2024, the Motion for Extension of Time to Serve and File the Initial Brief of Respondent and Designation of Matter, along with Proof of Service has been forwarded to Appellant's counsel, W. Chandler Norville, Esquire via email today, March 18, 2025, to cnorville@sccid.sc.gov.

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

This is the 18th day of March 2026.

s/P. Sanders Linker
Assistant Attorney General

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SC Court of Appeals

Brandy Rankin

From: Brandy Rankin
Sent: Wednesday, March 18, 2026 4:33 PM
To: cnorville@sccid.sc.gov
Cc: Warren, Kaylynn; Sanders Linker; Angela Brown; Donna D'Alessio
Subject: The State v. Terry Allen Paige, Jr. - Third Motion for Extension to file Initial Brief of Respondent and Designation of Matter - Appellate Case No. 2025-001075
Attachments: PAIGE - MOTION FOR THIRD EXTENSION OF TIME TO FILE INITIAL BRIE.pdf

Dear Mr. Norville,

Please find attached the Respondent's Third Motion for Extension to file the Initial Brief and Designation of Matter, together with the Proof of Service. These documents will be filed with the South Carolina Court of Appeals today, March 18, 2026, along with a copy of this email. Thank you.

Sincerely,

Brandy Rankin

Brandy Rankin, Legal Assistant
Office of the Attorney General
Post Office Box 11549
Columbia, South Carolina 29211
803-734-6305



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