

THE STATE OF SOUTH CAROLINA
In the Supreme Court

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S.C. SUPREME COURT

Appeal from Sumter County
Court of Common Pleas

The Honorable William P. Keesley, Circuit Court Judge

Appellate Case No: 2026-000115

Bobby Wayne Stone,

Respondent,

v.

State of South Carolina,

Petitioner.

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

The undersigned counsel would respectfully request a second thirty (30) day extension in which to file the Petition for Writ of Certiorari and Appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following good cause.

Respondent's Petition for Writ of Certiorari and Appendix is due on Monday, March 23, 2026. The undersigned attorney has had a number of state and federal matters to attend since February 18, 2026. Specifically,

1. 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;

2. Counsel assisted in preparing and filing 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;
3. 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;
4. Counsel filed the Return and Memorandum of Law in Support of Motion for Summary Judgment in the matter of Omar Shariff Gentile v. Randall Williams, A.C.I., C/A No. 4:25-cv-13140, on March 11, 2026;
5. Counsel is currently preparing for a hearing on March 24, 2026, in the capital matter of John Richard Wood v. State of South Carolina, Case No. 2022-CP-23-06219; and
6. 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 petition in this matter by granting a thirty (30) day extension of time in which to file the response, and ordering the response be filed on or before April 22, 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 Petition for Writ of Certiorari and Appendix.

Respectfully submitted,

ALAN WILSON
Attorney General

DONALD J. ZELENKA
Deputy Attorney General

MELODY J. BROWN
Senior Assistant Deputy Attorney General

R. BRANDON LARRABEE
Assistant Attorney General
State ID No. 104865

By: *s/ R. Brandon Larrabee*

Office of the Attorney General
Post Office Box 11549
Columbia, South Carolina 29211
(803) 734-6305

March 20, 2026

ATTORNEYS FOR PETITIONER