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Apr 13 2026

S.C. SUPREME COURT

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Oconee County

Honorable Jane H Merrill, Circuit Court Judge

RALPH JAKE GOSS, JR.,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2025-002332

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

Counsel for Ralph Goss respectfully requests an extension of thirty (30) days from April 13, 2026, until May 13, 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 Ralph Goss 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. Counsel filed the Return to Petition for Writ of Certiorari in the case of Christopher Ray Smith v. The State with the Supreme Court on April 10, 2026. Counsel filed the Petition for Writ of Certiorari to the Court of Appeals and Appendix in the case of Erick E. Wells v. The State with the Supreme Court on April 10, 2026. Counsel filed the Initial Brief of Appellant in the case of The State v. Jennifer Blair McNaughton with the Court of Appeals on April 8, 2026. Counsel filed the Petition for Rehearing in the case of Anthony Briggs v. The State with the Court of Appeals on April 2, 2026. Counsel filed the Petition for Writ of Certiorari and Joint Appendix in the case of Christopher Ray Smith v. The State with the Supreme Court on March 31, 2026. Counsel filed the Return to Petition for Writ of Certiorari in the case of Darius T. Cathcart v. The State with the Supreme Court on March 25, 2026. Counsel filed the Initial Brief of Appellant in the case of The State v. Toby Khan Armstrong with the Court of Appeals on March 23, 2026. Counsel filed the Anders Brief of Appellant and Record on Appeal in the case of The State v. Derrick Edward Gathers with the Court of Appeals on March 11, 2026. Counsel filed the Record on Appeal and Final Brief of Appellant in the case of The State v. Mustafa A. Salaam with the Court of Appeals on March 9, 2026. Counsel filed the Petition for Rehearing in the case of Erick E. Wells v. The State with the Court of Appeals on March 5, 2026.

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

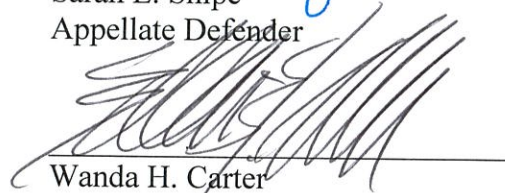
5. On March 30, 2026, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through May 1, 2026.

WHEREFORE, the undersigned counsel would respectfully request a thirty (30) day extension from April 13, 2026, until May 13, 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,



Sarah E. Shipe
Appellate Defender



Wanda H. Carter
Chief Appellate Defender

This 13th day of April, 2026.