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Apr 22 2026

SC Court of Appeals

STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Richland County
The Honorable Jocelyn J. Newman, Circuit Court Judge

THE STATE,

Respondent,

v.

JEROD DE'QUIN GOODWIN,

Appellant.

Appellate Case No. 2025-000260

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

The undersigned counsel would respectfully request a thirty (30) day extension in which to file the Initial Brief of Respondent and Designation of Matter in the above-referenced case. Opposing counsel has graciously consented to all extensions through May 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 today, April 22, 2026, as per this Court's Order granting Respondent's second extension request. The undersigned attorney for the Respondent has had a number of state and federal matters to attend to since March 2026. Specifically,

1. Counsel filed the Final Brief of Respondent on April 6, 2026, in the matter of The State v. William Gray Ackerman, Jr., Appellate Case No. 2024-001749, a matter pending in this Court;

2. Counsel prepared and presented Oral Argument on April 7, 2026 in the matter of The State v. Antonio V. Barnes, Jr., Appellate Case No. 2023-001390, a matter pending in this Court;
3. Counsel prepared and presented oral argument in the South Carolina Supreme Court, which took place at Presbyterian College in Greenville, South Carolina March 31, 2026, in the matters of The State v. Quinterris J. Carmichael, Appellate Case no. 2025-001214 and The State v. Tirik J. Johnson-Epps, Appellate Case No. 2025-001215;
4. Counsel prepared and filed the Respondent's Motion to Hold Time Limits in Abeyance on March 18, 2026, in the matter of Lindy Jones, Jr. vs. Warden Terri Wallace, C/A No: 5:25-cv-13279-SAL-KDW, a matter pending in the District Court;
5. Counsel filed the Motion for Summary Judgement and Return and Memorandum of Law in Support of Motion for Summary Judgment on April 1, 2026, in the matter of Sincere Owens vs. Warden Shane Jackson, C/A No.: 9:25-cv -13548-JD-MHC, a matter pending in the District Court;
6. Counsel prepared and filed the Return to Petition for Writ of Certiorari on April 13, 2026, in the matter of Suzanna Brown Simpson v. State of South Carolina, Appellate Case No. 2025-001244, a matter pending in the South Carolina Supreme Court;
7. Counsel filed the Reply to Response in Opposition on April 20, 2026, in the matter of Naijuwuan S. Chisolm vs. Warden of Ridgeland Correctional Institution, C/A No.: 1:25-cv-11722-JD-SVH, a matter pending in the District Court;
8. Counsel filed the Response in Opposition to Petitioner's Various Filings (ECF #27, 28, 29, 30) on April 20, 2026, in the matter of Joey Dean Coleman v. Warden of McCormick

Correctional Institution, C/A No.: 9:25-cv-12894-DCN-MHC, a matter pending in the District Court;

9. Counsel filed the Response in Opposition to Petitioner’s Request for the Appointment of Counsel and Reply to Response in Opposition on April 20, 2026, in the matter of Vance Ross vs. Warden, Broad River Correctional Institution, C/A No.: 0:25-cv-12833-DCN-PJG, a matter pending in the District Court;

10. Counsel prepared and litigated in a Capital Post-Conviction Relief Hearing on April 21, 2026, in Horry County South Carolina, in the matter of Luzenski Allen Cottrell v. State of South Carolina, C/A No. 2018-CP-26-05709;

11. Counsel is working on other state and federal matters, and this request is not made for the purpose of delay but due to the foregoing.

WHEREFORE, counsel respectfully requests a thirty (30) day extension of time to serve and file the Initial Brief and Designation of Matter.

Respectfully submitted,

ALAN WILSON
Attorney General

DONALD J. ZELENKA
Deputy Attorney General

MELODY J. BROWN
Senior Assistant Deputy Attorney General


W. JOSEPH MAYE
Assistant Attorney General

By: s/W. Joseph Maye.
W. Joseph Maye
No. 100851

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Columbia, South Carolina 29211
(803) 734-6305

ATTORNEY FOR RESPONDENT

I support the finding of good cause.

By: 
MELODY J. BROWN
Senior Assistant Deputy Attorney General

April 22, 2026

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PROOF OF SERVICE

I, W. Joseph Maye, certify that pursuant to Rule 262(c)(3), SCACR and the Supreme Court order of April 24, 2024, the third extension to file the third Motion for Extension to file Initial Brief of Respondent and Designation of Matter have been forwarded to Appellant's counsel, Wanda Carter via email today, April 22, 2026, to Wanda Carter @ WCarter@sccid.sc.gov and to Ms. Carter's legal assistant, Scott Leverett, to SLeverett@sccid.sc.gov.

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

This is the 22nd day of April 2026.

s/W. Joseph Maye

W. Joseph Maye

S.C. Bar No. 100851

Post Office Box 11549

Columbia, South Carolina 29211

ATTORNEY FOR RESPONDENT

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Apr 22 2026

SC Court of Appeals

Brandy Rankin

From: Brandy Rankin
Sent: Wednesday, April 22, 2026 3:00 PM
To: wcarter@sccid.sc.gov
Cc: sleverett@sccid.sc.gov; Tommy Evans, Jr.
Subject: The State v. Jerod De'Quin Goodwin - Third Motion for Extension to file Initial Brief of Respondent - Appellate Case 2025-000260
Attachments: Motion for Third Extension - Goodwin (signed).pdf

Dear Ms. Carter,

Please find attached the Third Motion for Extension together with the Proof of Service for which to file the Initial Brief & Designation of Matter. These documents will be filed with the South Carolina Court of appeals today, April 22, 2026, along with a copy of this email. Thank you.

Sincerely,

Brandy Rankin

Brandy Rankin, Legal Assistant to W. Joseph Maye
Office of the Attorney General
Post Office Box 11549
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803-734-6305



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