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May 06 2026

S.C. SUPREME COURT

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Pickens County

Honorable B. Alex Hyman, Circuit Court Judge

JOSE R. REYES,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2025-002118

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

Counsel for Jose Reyes Reyes respectfully requests a **final thirty (30) day extension, from May 6, 2026, until June 5, 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 third 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 Jose Reyes Reyes 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.

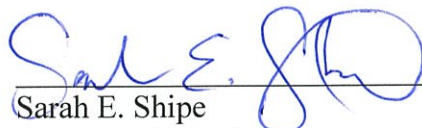
3. Counsel filed the Johnson Petition for Writ of Certiorari and Appendix in the case of Robert Davis Smith, Jr. v. The State with the Supreme Court on April 20, 2026. Counsel filed the Return to Petition for Writ of Certiorari in the case of Christopher Ray Smith v. The State with the Supreme Court 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.

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

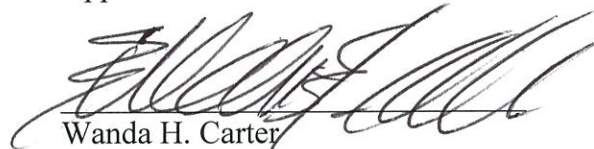
5. On April 29, 2026, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through June 1, 2026.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension from May 6, 2026, until June 5, 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 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 6th day of May, 2026.