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May 21 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 FOURTH 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 June 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 tomorrow, May 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 April 2026. Specifically:

1. Counsel prepared for and presented Oral Argument on May 5, 2026, in the matter of The State v. Darius G. Dickey, Appellate Case No. 2024-000145, a matter pending in the South

Carolina Court of Appeals;

2. Counsel prepared and filed the Motion for Summary Judgment, and the Return and Memorandum of Law in Support of Motion for Summary Judgment on May 12, 2026, in the matter of Gary Curtis Fraley, #364802 v. Warden Shane Jackson, C/A No. 4:25-cv-13501-BHH-TER, a matter pending in this Court;
3. Counsel prepared and filed the Reply to Petitioner's Motion to Strike (ECF #33) on May 12, 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 this Court;
4. Counsel prepared and filed the Motion for Summary Judgment and the Return and Memorandum of Law in Support of Motion for Summary Judgment on May 13, 2026, in the matter of Damorius D. Gaines, #346524, a/k/a Damorius Dontavis Gaines, a/k/a Damorius Dontavious Gaines v. Warden Shane Jackson, C/A No. 4:25-13730-DCC-TER, a matter pending in this Court;
5. Counsel filed the Reply to ECF #54 & #55 on May 18, 2026, in the matter of Naijuwan S. Chisolm vs. Warden of Ridgeland Correctional Institution, C/A No: 1:25-cv-11722-JD, a matter pending in this Court;
6. Counsel is working on the Initial Brief of Respondent and Designation of Matter due Monday June 1, 2026, in the matter of The State v. Brandon Lee Corder, Appellant Case No. 2023-001543, and for which there are no further extensions; this is a matter pending in this Court;
7. 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

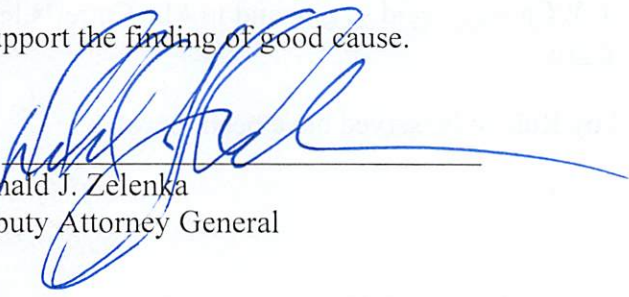
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By: s/W. Joseph Maye
W. Joseph Maye
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ATTORNEY FOR RESPONDENT

I support the finding of good cause.

By: 
Donald J. Zelenka
Deputy Attorney General

May 21, 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 fourth extension to file the Initial Brief of Respondent, Designation of Matter and Proof of Service have been forwarded to Appellant's counsel, via email today, May 21, 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 21st day of May 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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May 21 2026

SC Court of Appeals

Brandy Rankin

From: Brandy Rankin
Sent: Thursday, May 21, 2026 1:30 PM
To: Carter, Wanda
Cc: Leverett, Scott; Joe Maye
Subject: The State v. Jerod De'Quin Goodwin - Fourth Extension to file Initial Brief of Respondent - Appellate Case No. 2025-000260
Attachments: Fourth Extension IBOR Goodwin.pdf.pdf

Dear Ms. Carter,

Please find attached the Respondent's Fourth Motion for Extension in which to file the Initial Brief and Designation of Matter. This Motion will be filed today, May 21, 2026 together 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
Columbia, South Carolina 29211
803-734-6305



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