

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of General Sessions

Patrick C. Fant, III, Circuit Court Judge

Appellate Case Nos. 2025-000367

RECEIVED

Jun 30 2026

SC Court of Appeals

The State of South Carolina		Respondent,
	v.	
Zachary David Hughes		Appellant.

**MOTION FOR EXTENSION/STAY OF DEADLINE
TO FILE REPLY BRIEF**

Zachary David Hughes, the Appellant, moves this Court for an extension of time to file his reply brief to the State's Initial Response brief. In support of this Motion, he would show the following:

- On June 22, 2026, the State filed and served on Appellant's counsel its initial response brief;
- Pursuant to S.C.App.Ct.R. 208(a)(3), the Appellant has 10 days to file a reply from the date the initial response brief was served on his counsel. Currently, the deadline for the Appellant's reply brief is July 2, 2026;
- On June 30, 2026, the Appellant filed a Motion to Stay the Appellate Proceedings and for Remand to the Circuit Court. Should this Court grant the Motion, a reply brief may be temporarily or permanently unnecessary;
- In light of the Appellant's pending Motion to Stay, he would ask that the deadline for

his reply brief be extended and/or stayed until this Court rules on his June 30th motion; and

- Appellant's counsel contacted the State on June 29, 2026, and the State graciously consents to this Motion.

For the foregoing reasons, the Appellant requests that his deadline to file his reply brief be extended and/or stayed until this Court rules on his Motion to Stay and Remand to the Circuit Court.

Respectfully submitted,

s/Andrew B. Moorman, Sr.
Andrew B. Moorman, Sr. (SC Bar # 69670)
Mark Moyer (SC Bar # 64155)
Moyer Law Firm, LLC
12 Whitsett Street
Greenville, South Carolina 29601
(864) 775-5800 (Moorman)
(864) 775-5811 (Moyer)
andy@andymoormanlaw.com
mark@markmoyerlaw.com

OTHER COUNSEL OF RECORD:

Melody Brown, Esquire
Assistant Attorney General
P.O. Box 11549
Columbia, South Carolina 29211
mbrown@scag.gov

Cindy S. Crick Esquire
Greenville County Solicitor's Office
305 East North Street
Greenville, South Carolina 29601
ccrick@greenvillecounty.org

June 30, 2026.