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Jul 13 2026

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Lexington County

Honorable Vernon F. Dunbar, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

MICHAEL TODD ROBERTS, JR.,

APPELLANT

APPELLATE CASE NO. 2025-002273

MOTION FOR AN EXTENSION OF TIME TO
SERVE AND FILE THE INITIAL BRIEF OF APPELLANT
AND DESIGNATION OF MATTER

Counsel for Michael Todd Roberts respectfully requests a **fourth and final thirty (30) day extension** from July 13, 2026 until August 12, 2026 in which to serve and file the Initial Brief of Appellant and Designation of Matter in the above-referenced case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. This is a fourth request for an extension. In support of this request, counsel shows:

1. The Initial Brief of Appellant and Designation of Matter in this case are due to be served and filed with the Court today.
2. Counsel for Michael Todd Roberts 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.

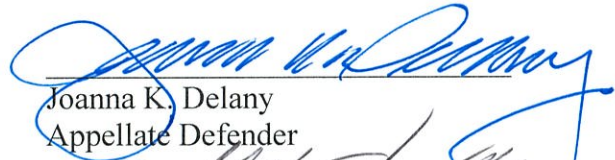
3. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Virginia L. Driver with the Court of Appeals on July 9, 2026. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Dontrell L. Huff with the Court of Appeals on July 2, 2026. Counsel filed the Petition for Writ of Certiorari to the Court of Appeals and accompanying Appendix in the case of Herbert Holmes v. State with the Supreme Court on June 18, 2026. Counsel filed the Return to the Petition for Writ of Certiorari in the case of The State v. Eric A. Graham with the Supreme Court on June 18, 2026. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Tyberious R. Pyles with the Court of Appeals on June 11, 2026. Counsel filed the *Johnson* Petition for Writ of Certiorari and Appendix in the case of Jeffrey McCoy v. State with the Supreme Court on June 8, 2026. Counsel filed the *Johnson* Petition for Writ of Certiorari and accompanying Appendix in the case of Zaquai Shuler v. State with the Supreme Court on May 27, 2026.

4. Counsel makes this request in good faith and not for purpose of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

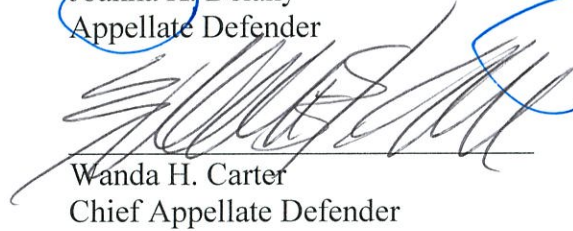
5. On July 2, 2026, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through August 1, 2026.

WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension** from July 13, 2026 until August 12, 2026 in which to serve and file the Initial Brief of Appellant and Designation of Matter in this case based upon the above exigent circumstances.

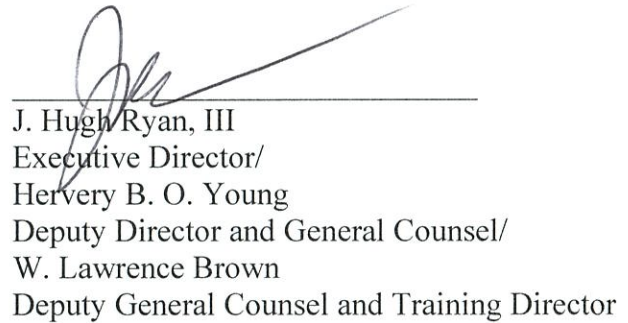
Respectfully submitted,



Joanna K. Delany
Appellate Defender



Wanda H. Carter
Chief Appellate Defender



J. Hugh Ryan, III
Executive Director/
Hervey B. O. Young
Deputy Director and General Counsel/
W. Lawrence Brown
Deputy General Counsel and Training Director

This 13th day of July, 2026.

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APPELLANT

APPELLATE CASE NO. 2025-002273

CERTIFICATE OF SERVICE

Pursuant to Rule 262(a)(3) and Rule 262(c)(3), SCACR, the undersigned hereby certifies a true copy of the Motion for Extension in the above-referenced case has been served upon Mark Farthing, Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), this 13th day of July, 2026.



Joanna K. Delany
Appellate Defender

ATTORNEY FOR APPELLANT

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Jul 13 2026

SC Court of Appeals

From: [Mcinnis, Sara](#)
To: [Mark Farthing](#)
Cc: [Caroline Collins](#); [Delany, Joanna](#)
Subject: 2025-002273 The State v. Michael T. Roberts Jr. Extension 4
Date: Monday, July 13, 2026 3:46:00 PM
Attachments: 2025-002273 The State v. Michael T. Roberts Jr. Extension 4.pdf

Good afternoon Mr. Farthing,

Attached for service in the above-referenced case is the fourth motion for an extension of time to serve and file the initial brief of appellant and designation of matter. This motion will be filed with the Court of Appeals today, July 13, 2026, via email filing.

Thank you,

Sara McInnis
Administrative Assistant
South Carolina Commission on Indigent Defense
Appellate Division
(803) 734-1330