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Aug 13 2026

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
In The Court of Appeals**

APPEAL FROM RICHLAND COUNTY
In the Court of General Sessions

The Honorable Christopher D. Taylor, Circuit Court Judge

Case No. 2022A4010400089-93; 2022A4010400100-110; 2022A4010400115-118
2023GS4002562-2566; 2023GS4002572-2582; 2023GS4002587-2590

State of South Carolina..... Respondent

v.

Caroline Pennington Petitioner

**PETITIONER’S SECOND MOTION TO EXTEND THE
DEADLINE FOR FILING BRIEF**

Petitioner, pursuant to Rule 240 of the South Carolina Appellate Court Rules, respectfully moves for an Order extending the deadline for filing her brief.

Petitioner filed for an appeal on November 4, 2025. The state subsequently filed an Omnibus Post Trial Motion on November 12, 2025. Following the disposition of that motion, Petitioner appellate counsel timely refiled a Notice of Appeal on January 29, 2026. Petitioner’s appellate counsel received trial transcript on June 29, 2026. The Court previously granted Petitioner’s first Motion for Extension of Time, extending the deadline to August 28, 2026. This is the second motion for an extension of time filed in this appeal. Petitioner respectfully requests that the deadline for filing the Initial Brief be extended to September 27, 2026.

Petitioner is cognizant of the Court’s procedure regarding multiple extension of time pursuant to the Supreme Court’s standing order of March 18, 2009. The Order notes that “[a]

second extension may be granted upon a showing of good cause. The facts supporting good cause shall be set forth in the motion.” Petitioner notes good cause in this case stems from a couple of factors. First, Counsel initially had an appointment to meet with Petitioner at Leath Correctional Institution on July 17, 2026, but that had to be rescheduled based on the schedule at the prison. Because of Counsel’s other commitments, that rescheduled conference could not take place until August 11, 2026. Further, Counsel’s staff has been working with the Clerk of Court’s Office at Richland County to secure copies of the exhibits and the remainder of the Court file. The request was made on July 23, 2026. The files were not ready to be picked up until July 30, 2026, and paid for picked up from the Court on August 3, 2026. Upon receipt, each folder contained duplicates of the previous folder, meaning the materials provided were incomplete and requiring a new request for the file. These documents are necessary to ensure a complete Designation of Matter to be Considered on Appeal. Moreover, Counsel loses the week of August 17, 2026, to move two children into colleges (one in Ohio and one in Virginia).

This additional time is necessary to allow appellate counsel to thoroughly review the completed initial brief with Petitioner before filing. The Attorney General’s office indicated that it does not oppose Petitioner’s request.

Appellate counsel requests additional time to meet with Petitioner in person a second time to review the completed draft brief and ensure that all documents necessary for the Designation of Matter has been received.

WHEREFORE, for the foregoing reasons, Petitioner respectfully requests with the consent of Respondent, that this Court grant this Secon Motion for Extension of Time and extend the deadline for filing Petitioner's Initial Brief to September 27, 2026.

Respectfully submitted:

A handwritten signature in black ink, appearing to read "Mario A. Pacella", with a long horizontal flourish extending to the right.

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2023GS4002562-2566; 2023GS4002572-2582; 2023GS4002587-2590

Caroline Dawn Pennington Appellant
v.

State of South Carolina Respondent

PROOF OF SERVICE

The undersigned hereby certifies that on August 13, 2026, served the Motion for Extension in this matter on the State of South Carolina by emailing a copy of the same to its attorney of record, Mark Farthing, mfarthing@scag.gov.

Respectfully submitted,



August 13, 2026

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