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Sep 18 2026

SC Court of Appeals

STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Georgetown County
The Honorable Michael G. Nettles, Circuit Court Judge

THE STATE,

Respondent,

v.

RONNIE LEGRAND TODD, JR.,

Appellant.

Appellate Case No. 2025-001649

**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-reference case. Opposing counsel has consented to all extension requests through October 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 today, September 18, 2026, as per this Court's Order dated August 20, 2026, granting Respondent's third extension request. The undersigned attorney for the Respondent has had a number of state and federal matters to attend to since August 20, 2026. Counsel has done a substantial amount of research and work on this case and the following appeals: *State v. Tyler Givens* (2024-001995); *State v. Kenneth Dawson*

(2025-000114); and *State v. Ryan Woodruff* (2025-000101); as well as *Douglas Young v. Warden Corhen* (5:26-02708-BHH-KDW). Additionally, undersigned counsel has filed a Motion to Strike Designation of Matter in *State v. Michael Whitlock* (2025-001221); a Motion to Dismiss in *Tyrone Ellison v. Warden Lee Correctional Institution* (1:26-02076-SAC-MGB); and intends to file a Motion for Summary Judgment and Memorandum in Support of Motion for Summary Judgment today in *Michael Gay v. Lee Correctional Institution* (5:25-14035-BHH-KDW).

Additionally, counsel has been receiving necessary medical treatment over the last several months that has limited her work hours.

Due to counsel's involvement in these and other matters, counsel is unable to timely complete the Initial Brief of Respondent and Designation of Matter.

WHEREFORE, counsel respectfully requests a thirty (30) day extension of time to serve and file the Initial Brief of Respondent and Designation of Matter.

Respectfully Submitted,

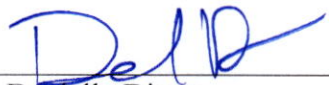
ALAN WILSON
Attorney General

DONALD J. ZELENKA
Deputy Attorney General

MELODY J. BROWN
Senior Assistant Deputy Attorney General

DANIELLE DIXON
Assistant Attorney General
No. 73999

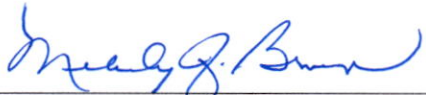
Post Office Box 11549
Columbia, South Carolina 29211
(803) 734-6305

By: 
Danielle Dixon

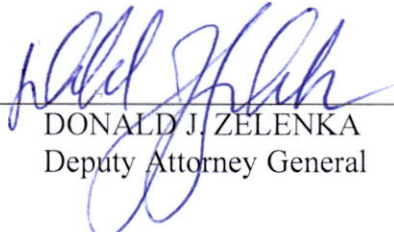
ATTORNEYS FOR RESPONDENT

September 18, 2026.

I support the finding of good cause.

By: 
MELODY J. BROWN,
Senior Assistant Deputy Attorney General

I, too, support the finding of good cause.

By: 
DONALD J. ZELENKA
Deputy Attorney General

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PROOF OF SERVICE

The undersigned certifies that pursuant to Rule 262(c)(3), SCACR and the Supreme Court order of April 24, 2024, the Fourth Motion for Extension of Time, along with Certificate of Service has been forwarded to Appellant's counsel, W. Chandler Norville, Esquire via email today, September 18, 2026 to cnorville@sccid.sc.gov and his assistant Kaylynn Warren at kwarren@sccid.sc.gov.

I further certify that all parties required by Rule to be served have been served.

This is the 18th day of September 2026.



Susan Spencer
Legal Assistant

Office of the Attorney General
Post Office Box 11549
Columbia, South Carolina 29211
(803) 734-6305

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SC Court of Appeals

From: [Susan Spencer](#)
To: cnorville@sccid.sc.gov
Cc: [Danielle Dixon](#); [Warren, Kaylynn](#)
Subject: State v. Ronnie Todd (2025-001649)
Date: Friday, September 18, 2026 1:17:00 PM
Attachments: [image001.png](#)
[Ronnie Todd - Motion for Fourth Extension \(IBOR\).pdf](#)

Good afternoon, Mr. Norville,

Attached please find a motion for a fourth extension of time within which to serve and file the Initial Brief of Respondent and Designation of Matter in *State v. Ronnie Todd* (2025-001649). This motion will be filed today with the Court of Appeals.

Thank you.

SUSAN SPENCER, Legal Assistant
South Carolina Attorney General's Office
803-734-6305 | susanspencer@scag.gov
P.O. Box 11549 | Columbia, SC 29211



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