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Oct 14 2026

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Lexington County

Debra R. McCaslin, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

JOSE MANUEL RAMIREZ,

APPELLANT

APPELLATE CASE NO. 2025-001968

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

Counsel for Jose Ramirez respectfully requests a **fourth and final thirty (30) day extension from October 14, 2026 until November 13, 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 Jose Ramirez 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.

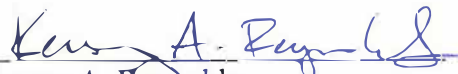
3. Counsel filed the Petition for Writ of Certiorari, the Petition for Writ of Certiorari Pursuant to *Austin v. State* and the Appendix in the case of Quentin Evans v. The State with the Supreme Court on September 30, 2026. Counsel attended the mandatory Annual South Carolina Public Defender Conference in Myrtle Beach, South Carolina from September 28-30, 2026. Counsel filed the Petition for Writ of Certiorari and the Appendix in the case of Delmar R. Sanders v. The State with the Supreme Court on September 25, 2026. Counsel presented a Constitution Day lesson to students at Leslie M. Stover Middle School in Elgin, South Carolina as a part of the South Carolina Bar Young Lawyers Division Constitution Day programming on September 17, 2026. Counsel filed the Petition for Writ of Certiorari and the Appendix in the case of Tristan W. Ramey v. The State with the Supreme Court on September 2, 2026. Counsel began employment with the Division of Appellate Defense on August 3, 2026.

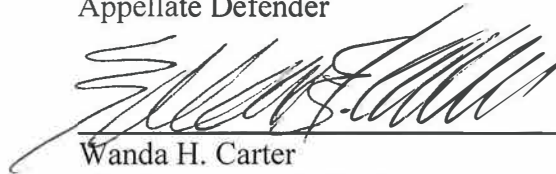
4. Counsel makes this request in good faith and not for purpose of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

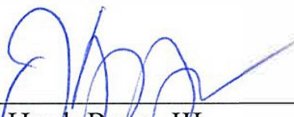
5. On September 24, 2026, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through November 1, 2026.

WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension from October 14, 2026 until November 13, 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,


Kersey A. Reynolds
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 14th day of October, 2026.

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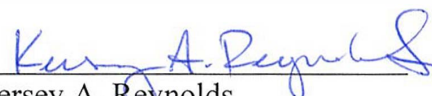
JOSE MANUEL RAMIREZ,

APPELLANT

APPELLATE CASE NO. 2025-001968

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 R. Farthing, Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), this 14th day of October, 2026.


Kersey A. Reynolds
Appellate Defender

ATTORNEY FOR APPELLANT



Outlook

2025-001968 The State v. Jose Manuel Ramirez

From Walkup, Catherine <walkup@sccid.sc.gov>

Date Wed 10/14/2026 10:07 AM

To mfarthing@scag.gov <mfarthing@scag.gov>

Cc Reynolds, Kersey <kreynolds@sccid.sc.gov>; gracesommer@scag.gov <gracesommer@scag.gov>

 1 attachment (202 KB)

2025-001968 The State v. Jose Manuel Ramirez Fourth Motion for Extension.pdf;

Good morning,

Attached for service in the above-referenced case is the fourth motion for extension which will be filed today October 14th with the Court of Appeals via email filing.

Respectfully,

Catherine Walkup, Administrative Assistant

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