

Oct 19 2026

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM PICKENS COUNTY
Court of Common Pleas
The Honorable B. Alex Hyman, PCR Judge
The Honorable Perry H. Gravely, Trial Judge

Appellate Case No. 2025-002118

Jose R. Reyes, #370793,

Petitioner,

v.

State Of South Carolina,

Respondent.

**MOTION FOR A FOURTH EXTENSION OF TIME TO SERVE AND FILE THE
RETURN TO PETITION FOR A WRIT OF CERTIORARI**

Counsel for Respondent respectfully moves for a **fourth** and **final** extension of thirty (30) days in which to serve and file the Return to Petition for Writ of Certiorari in this case. This is a fourth request for an extension. In support of this request, Counsel shows¹:

1. The Return to Petition for a Writ of Certiorari is due to be served and filed with the Court today, October 19, 2026.
2. Counsel for Respondent respectfully submits that extraordinary circumstances exist that warrant the granting of an additional time extension. Given the number of extensions

¹ In compliance with: In Re: Extensions in Criminal and Post-Conviction Relief Cases, (S.C. Sup. Ct. order dated March 18, 2009) (Davis Adv. Sh. No. 13 at 1).

previously granted and the order in which Counsel attempts to manage his heavy caseload, Counsel hopes that no further extension requests will be required.

3. Counsel had a term of court on October 5 – 9, 2026, in the Seventh Judicial Circuit.
4. Counsel had a term of court on October 12 – 16, 2026, in the Eighth Judicial Circuit.
5. Counsel has been working on orders of dismissal for the Second and Sixteenth Judicial Circuits.
6. This extension request is made in good faith and not intended for delay, but rather due to counsel's heavy workload and to ensure the return is properly researched and prepared.
7. Opposing counsel has graciously consented to this request via interagency agreement.

|SIGNATURE PAGE FOLLOWS|

WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension in which to serve and file the Return to Petition for Writ of Certiorari in this case based upon the above exigent circumstances.

Respectfully submitted,

ALAN WILSON
Attorney General

DONALD J. ZELENKA
Deputy Attorney General

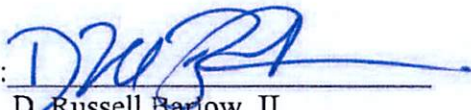
D. RUSSELL BARLOW, II
Senior Assistant Deputy Attorney General

JORDAN B. KILLOUGH
Assistant Attorney General

BY: 
Jordan B. Killough
S.C. Bar No. 107673
Office of the Attorney General
Post Office Box 11549
Columbia, SC 29211
(803) 734-3737

ATTORNEYS FOR RESPONDENT

I have reviewed and approved this extension request.

By: 
D. Russell Barlow, II
Senior Assistant Deputy Attorney General

October 19, 2026