

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
Court of General Sessions

Patrick C. Fant, III, Circuit Court Judge

Appellate Case No. 2025-000367

The State of South Carolina

Zachary David Hughes

v.

Respondent,

Appellant.

**FOURTH MOTION FOR EXTENSION OF TIME**

Zachary David Hughes moves this Court for a 30-day extension of time to file his initial brief. Hughes' current deadline is November 10, 2025. In support of this Motion, he would show the following:

- On February 20, 2025, a jury convicted Hughes of multiple offenses, including murder, and the trial court sentenced him to life imprisonment after a prosecution that lasted more than three years and a trial proceeding that lasted ten days;
- On July 10, 2025, counsel for Hughes received the transcript. The transcript, with its accompanying attachments and/or exhibits, comprises 1,172 pages. The transcript commemorates jury selection, the parties' arguments and the trial court's rulings on multiple motions that were made both pretrial and during the trial, the testimony of approximately 35 witnesses, both before the jury and under proffer, objections the parties made during this testimony and the trial court's ruling on these objections, jury instructions conferences, the parties' closing arguments, and the trial court's

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**SC Court of Appeals**

sentencing of Mr. Hughes. Additionally, the transcript commemorates discussion in connection with in excess of 200 exhibits.

- In reviewing the transcript, counsel for Mr. Hughes have identified in excess of ten issues they believe have merit and will be raised on appeal;
- The current, working draft of the brief is well in excess of 60 pages, and Mr. Hughes anticipates filing a motion for permission to file an initial brief in excess of the page limit contained in SC.R.App. 208;
- Mr. Hughes is currently being housed in Lieber Correctional Institute, which is located approximately 183 miles from counsel for Hughes' office. Counsel visited Mr. Hughes on October 17, 2025, and he provided them with valuable insights that counsel will likely use to supplement the working draft of their brief. Further, counsel would like an opportunity to visit with him one more time prior to filing the initial brief to ensure he understands the arguments counsel will be making on his behalf and to obtain additional input on these arguments.
- Counsel for Mr. Hughes contacted the State on November 6, 2025, and the State graciously consented to this Motion for Extension.

For the foregoing reasons, Mr. Hughes requests a 30-day extension from November 10, 2025.

Respectfully submitted,

s/Andrew B. Moorman, Sr.  
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**PROOF OF SERVICE**

I certify that on this, the 10<sup>th</sup> day of November, 2025, Appellant's Fourth Motion for Extension of Time was served on the Thirteenth Circuit Solicitor's Office and the South Carolina Attorney General's Office by email and/or US Mail.

Respectfully submitted,

s/Andrew B. Moorman, Sr.

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November 10, 2025.

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