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IN THE SUPREME COURT OF THE STATE OF MISSISSIPPI No. 2024-TS-01178-SCT

CARLY MADISON GREGG a/k/a CARLEY MADISON GREGG

APPELLANT

V.

STATE OF MISSISSIPPI

APPELLEE

MOTION FOR ENLARGEMENT OF TIME TO FILE APPELLANT'S BRIEF

COMES NOW the Appellant, Carly Madison Gregg a/k/a Carley Madison Gregg, by and through counsel, and files this Motion For Enlargement Of Time To File Appellant's Brief, and in support thereof would most respectfully show unto the Court the following, to-wit:

- 1. Pursuant to this Court's previous extension, the Appellant's Brief in this matter is scheduled to be filed on or before July 30, 2025. Due to numerous pending obligations, commitments, and the substantial size and complexity of this matter, counsel has been unable to finalize Appellant's brief by the said deadline.
- Appellant respectfully submits that counsel has identified in excess of thirty-five (35) 2. potential assignments of error, each of which has necessitated extensive legal research and careful drafting. Appellant therefore requests additional time to evaluate and organize these issues and, where appropriate, consolidate them into a more concise and manageable group of assignments so as to avoid an excessively lengthy brief. In addition, certain facts and circumstances concerning Appellant's lead trial counsel have come to light within the past thirty (30) days, which may bear relevance to the issues raised in this direct appeal.
- 3. Counsel for Appellant anticipates that an additional thirty (30) days will be required to complete and file the Appellant's Brief. This additional time will allow counsel to further

investigate and analyze the newly discovered circumstances relating to lead trial counsel, conduct

any remaining legal research, ensure the accuracy of citations and references to the record, and

prepare a brief that is as concise as possible while fully addressing the issues on appeal in a clear,

organized, and professional manner.

4. This request is not being filed for purposes of undue delay or for any other dilatory

purpose. Rather, Appellant submits that it is made in good faith and with the sincere intention

of submitting a complete and well-reasoned brief that will assist the Court in its review of this

case. Counsel believes that the interests of justice will be best served by allowing the requested

extension.

WHEREFORE, PREMISES CONSIDERED, Appellant respectfully requests this Court

grant an enlargement of time of thirty (30) days, extending the deadline for filing Appellant's

Brief to August 29, 2025.

Respectfully submitted,

CARLY MADISON GREGG a/k/a

CARLEY MADISON GREGG

BY; /s/.

/s/ James H. Murphy

JAMES H. MURPHY, MSB# 102223

ATTORNEY FOR APPELLANT

CERTIFICATE OF SERVICE

I, James H. Murphy, Attorney for Appellant, I electronically filed the foregoing with the Clerk of the Court using the MEC system which sent notification of such filing to all counsel of record and the Clerk of the Supreme Court of Mississippi and the Court of Appeals.

This the 30th day of July, 2025.

/s/ James H. Murphy

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