

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Florence County

D. Craig Brown, Circuit Court Judge

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THE STATE,

RESPONDENT,

V.

MICHAEL CHRISTIAN BARCLAY,

APPELLANT.

APPELLATE CASE NO. 2021-000976

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

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Counsel for Michael Christian Barclay respectfully requests a **fourth and final thirty (30) day extension** from **July 25, 2022, until August 24, 2022**, in which to serve and file the initial brief of appellant and designation of matter in the above-referenced case. 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 Michael Christian Barclay respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time.

3. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Bradley Mark Corlew in this Court on July 20, 2022. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Jason Cash v. State in the Supreme Court on July 18, 2022. Counsel filed the brief of petitioner in the case of State v. Nathaniel Bradley in this Court on July 13, 2022. Counsel was a guest speaker at the Blues, BBQ & Bar CLE on the topic of Precisely Preserving Precious Errors on July 8, 2022, in Greenwood, South Carolina, sponsored by the South Carolina Association of Criminal Defense Lawyers. Counsel had an oral argument in the case of State v. Kyle Maurice Robinson in this Court on June 16, 2022. Counsel had an oral argument in the case of State v. John William McCarty in the Supreme Court on June 8, 2022. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Denzell Deshawn Jackson in this Court on June 6, 2022.

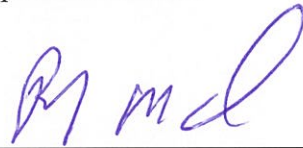
4. Counsel makes this request in good faith and not for purpose of delay.

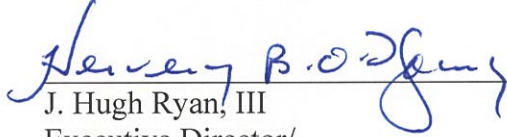
5. On June 30, 2022, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through July 31, 2022.

WHEREFORE, the undersigned counsel respectfully requests a **fourth and final thirty (30) day extension from July 25, 2022 until August 24, 2022**, in which to serve and file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances. Counsel respectfully requests that the time limits for filing the initial brief of appellant and designation of matter be held in abeyance pending a ruling on this motion.

Respectfully submitted,

  
\_\_\_\_\_  
Susan B. Hackett  
Appellate Defender

  
\_\_\_\_\_  
Robert M. Dudek  
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 25<sup>th</sup> day of July, 2022.

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

\_\_\_\_\_  
Appeal from Florence County

D. Craig Brown, Circuit Court Judge  
\_\_\_\_\_

**RECEIVED**

**Jul 25 2022**

**SC Court of Appeals**

THE STATE,

RESPONDENT,

V.

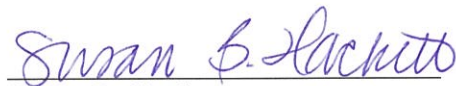
MICHAEL CHRISTIAN BARCLAY,

APPELLANT.

APPELLATE CASE NO. 2021-000976  
\_\_\_\_\_

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 of time to serve and file the initial brief of appellant and designation of matter in the above-referenced case has been served upon Melody J. Brown, Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), which is [mbrown@scag.gov](mailto:mbrown@scag.gov), this 25<sup>th</sup> day of July, 2022.



Susan B. Hackett  
Appellate Defender

ATTORNEY FOR APPELLANT

**From:** [Stock, Chris](#)  
**To:** ["SC - BROWN MELODY"; Angela Brown](#)  
**Cc:** [Hackett, Susan](#)  
**Subject:** 2021-000976 State v. Michael Barclay - Ext. 4 Initial Brief of Appellant  
**Date:** Monday, July 25, 2022 9:18:00 AM  
**Attachments:** [2021-000976 State v. Michael Barclay - Ext. 4 Initial Brief of Appellant.pdf](#)

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Ms. Brown,

Please find attached for service the 4<sup>th</sup> Request for Extension for Initial Brief of Appellant and Designation of Matter for Michael Christian Barclay's appeal which will be filed today with the Court of Appeals.

Thank you.

Chris

**Chris Stock**  
Administrative Assistant  
Commission on Indigent Defense  
Appellate Division  
(803) 734-1330