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Aug 31 2022

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY  
Court of General Sessions

Appellate Case No. 2021-000569

The Honorable Diane S. Goodstein, Circuit Court Judge

The State of South Carolina.....Respondent,

v.

Muanah A. Fortune, Jr. ....Appellant.

**MOTION FOR EXTENSION TO FILE REPLY BRIEF**

The reply brief in this case was currently due August 25, 2022. Respectfully, counsel requests an additional 2 weeks to file the reply due to caseload issues. Counsel was in Mississippi the week of August 1- 4, 2022 for work in two capital cases. She also filed a Petitioner’s brief due in the South Carolina Supreme Court on August 11, 2022. *State v. William Carpenter*, No. 2021-000711. She also filed an informal brief due in the Fourth Circuit on August 19, 2022. *Vernon Goodwin v. Kenneth Nelsen*, Case No. 22-6761. She also had a successor PCR hearing relating to a *Brady* claim that was heard in Anderson County Court of Common Pleas on August 25, 2022 and involved preparing for the testimonies of 7 witnesses. *Daniel Crowe v. State of South Carolina*, 2021-CP-37-0663. On September 2, 2022, she has another PCR hearing in Lancaster County Court of Common Pleas. *Michael Brent Gay v. State of South Carolina*, 2019-CP-29-000975. She also had a reply brief due in federal court on August 7, 2022 on a motion for a new trial in light of the United States Supreme Court’s opinion in *Ruan v. United States*, 142 S. Ct. 2370 (2022). *US v. Ronald Hargrave*, CIA 2:18-cr-00425. In addition to these obligations, counsel also filed a petition for a writ of certiorari and appendix in the South Carolina Supreme Court for David Busby, a response to a motion to dismiss a federal appeal for Nelson Escobar, two appearances in federal court for federal inmates Chadwick Jones and Bernard Breeland, and a proffer session with the US Attorney’s Office and a postal inspector for a criminal defendant, Elijah Ellis. Candidly, August was the busiest month in recent memory due to the unexpected but necessary trip to Mississippi and two PCR hearings (which counsel very seldom handles). September is not nearly as busy as this past month has been. Counsel sincerely apologizes for missing the due date of the reply brief in this case and respectfully requests that she be allowed to file the reply brief in this case on September 12, 2022.

Respectfully submitted,

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August 31, 2022