

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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Nov 14 2022

SC Court of Appeals

Appeal from Greenville County
Honorable G.D. Morgan, Jr., Circuit Court Judge
Appellate Case No. 2022-000374

THE STATE,

Respondent,

vs.

KATHRYN M. KEY

Appellant.

**MOTION FOR THIRD EXTENSION OF TIME WITHIN WHICH
TO SERVE AND FILE INITIAL BRIEF OF RESPONDENT
AND DESIGNATION OF MATTER**

Respondent (“the State”), through its undersigned counsel, would respectfully show unto the Court as follows:

I.

The Initial Brief of Respondent and Designation of Matter are due to be served and filed on November 14, 2022.

II.

Pursuant to RE: Extension Requests in Criminal Direct Appeals and Post-Conviction Relief Certiorari Proceedings: Order of the South Carolina Supreme Court dated March 18, 2009, the State moves for a **third** extension in the above-referenced criminal appeal and asks for an additional thirty days to complete the brief in this case. In the past month, the undersigned counsel prepared for an oral argument in Mack Washington Jr. v. State held in the Court of

Appeals; submitted an Initial Brief of Respondent and Designation of Matter to the Court of Appeals in State v. Terry G. Gridine.; and submitting today a Brief of Respondent in Nathaniel Bradley v. State.

III.

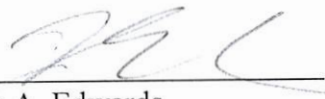
The undersigned counsel submits this extension request is supported by good cause and is not intended for purposes of delay. The brief in the above-referenced case has required significant research because the case involves an important appellate issue related to a claim of self-defense. The undersigned counsel is currently working on the brief in this case and intends to have it finished in a timely manner. However, the undersigned counsel has not yet been able to finish the brief due to a heavy workload. Accordingly, in order to ensure the brief is properly researched and prepared, I would therefore request an additional extension of time within which to serve and file the brief.

WHEREFORE, Respondent prays that the Court extend the deadline for the service and filing of the Initial Brief of Respondent and Designation of Matter in this case for thirty days from the date such relief is granted; hold the matter in abeyance pending a ruling on Respondent's motion; and grant such other and further relief as the Court may deem just and proper.


Respectfully submitted,

ALAN WILSON
Attorney General

JOSHUA A. EDWARDS
Assistant Attorney General

By: 
Joshua A. Edwards
S.C. Bar Number 101188

I have reviewed and approved this extension request.

By: 
William M. Blich, Jr.
Senior Assistant Deputy Attorney General

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THE STATE,

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Appellant.

PROOF OF SERVICE

I, Leigh Ann Stone, certify I have served the within Motion for Third Extension of Time Within Which to Serve and File Initial Brief of Respondent and Designation of Matter on Appellant by sending an electronic copy via email to the address listed in AIS for the following individual:

Elizabeth Powers Price, Esquire
Price Law Firm, P.A.
644 E. Washington Street
Greenville, SC 29601

I further certify all parties required by Rule to be served have been served.
This 14th day of November, 2022.


LEIGHANN STONE
Legal Assistant
Office of the Attorney General
Post Office Box 11549
Columbia, SC 29211

Leigh Ann Stone

From: Leigh Ann Stone
Sent: Monday, November 14, 2022 5:00 PM
To: 'powers@price-law-firm.com'
Cc: Josh Edwards; William Blich
Subject: State v. Kathryn Martin Key (2022-000374)
Attachments: KEY Kathryn - Third Extension Request (IBOR) (03154164xD2C78).PDF

Good Afternoon Ms. Price,

Attached please find a request for a third extension of time within which to serve and file the Initial Brief of Respondent and Designation of Matter in The State v. Kathryn Martin Key (2022-000374). This extension request will be submitted to the South Carolina Court of Appeals today via the AIS One Drive System.

If you will, please reply to confirm receipt of this email.

Thank you!

LEIGH ANN STONE, Legal Assistant
South Carolina Attorney General's Office
Criminal Appeals | Office 803-734-7239 | LeighAnnStone@scag.gov
P.O. Box 11549 | Columbia, SC 29211
scag.gov



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