

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

Dec 19 2022

SC Court of Appeals

Appeal from Charleston County
Honorable Jennifer B. McCoy, Circuit Court Judge
Appellate Case No. 2022-000336

THE STATE,

Respondent,

vs.

RONZELL BILAH OLDS,

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 December 19, 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 few weeks, the undersigned counsel has participated in a consolidated oral argument held at the Supreme Court

in State v. William Holmes and State v. Darell Oneil Boston and has submitted an Initial Brief of Respondent to the Court of Appeals in State v. Randy Lee Cantrell and State v. Aaron Mckenzie Capers. Additionally, the undersigned counsel prepared for and presented at the “Appellate Advocacy Workshop: Oral Argument” continuing legal education program for the South Carolina Bar and the South Carolina Trial and Appellate Advocacy Section and has also participated in a mandatory training program involving the South Carolina Department of Administration. Along with that and other responsibilities in the office, the undersigned counsel has further had to be out of the office for several days over the course of the last few weeks—including a portion of today’s date—due to an unexpected family emergency.

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 two important appellate issues related to the timing of the indictments and trial. 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

MARK R. FARTHING
Senior Assistant Attorney General

By: 

Mark R. Farthing
S.C. Bar Number 76901

I have reviewed and approved this extension request.

By: 

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

December 19, 2022

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

Dec 19 2022

SC Court of Appeals

Appeal from Charleston County
Honorable Jennifer B. McCoy, Circuit Court Judge
Appellate Case No. 2022-000336

THE STATE,

Respondent,

vs.

RONZELL BILAH OLDS,

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:

Kathrine H. Hudgins, Esquire
S.C. Commission on Indigent Defense
Division of Appellate Defense
Post Office Box 11589
Columbia, SC 29211

I further certify all parties required by Rule to be served have been served.
This 19th day of December, 2022.


LEIGH ANN STONE
Legal Assistant

Leigh Ann Stone

From: Leigh Ann Stone
Sent: Monday, December 19, 2022 12:07 PM
To: 'khudgins@sccid.sc.gov'
Cc: Mark Farthing; William Blitch; 'Stock, Chris'
Subject: State v. Ronzell Bilah Olds (2022-000336)
Attachments: Olds.Third Extension Request (IBOR) (03179764xD2C78).PDF

Good Afternoon Ms. Hudgins,

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. Ronzell Bilah Olds (2022-000336). This 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

RECEIVED
Dec 19 2022
SC Court of Appeals



This email, which includes any attachments, is considered confidential and may be legally privileged. If you have received it in error, please notify the sender immediately by reply email and then delete this message from your system. Please do not copy it, use it for any purposes, or disclose its contents to any other person, unless otherwise directed. This email is subject to FOIA requests. Thank you for your cooperation.