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Jan 18 2023

SC Court of Appeals

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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

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THE STATE,

Respondent,

vs.

RONZELL BILAH OLDS,

Appellant.

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

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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 January 18, 2023.

**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 **fourth** extension in the above-referenced criminal appeal and asks for an additional thirty days to complete the brief in this case. Yesterday, the undersigned counsel submitted an Initial Brief of Respondent to the Court of Appeals in State v. Tamika

Yolanda Williams. Likewise, in the past few weeks, the undersigned counsel has submitted a Brief of Respondent to the Supreme Court in State v. Robert Lee Miller, III and has submitted a Return to Petition for Rehearing to the Court of Appeals in State v. Shi Heme Raquan Price. Along with that and other responsibilities in the office, the undersigned counsel was away from the office for a significant number of days throughout the month of December due to an unexpected family emergency.

### **III.**

The undersigned counsel submits this extension request is supported by extraordinary circumstances 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.

### **IV.**

Before filing this extension request, the State has consulted with counsel for Appellant about the matter, and counsel for Appellant has graciously indicated she does not oppose the State's request for an additional extension.

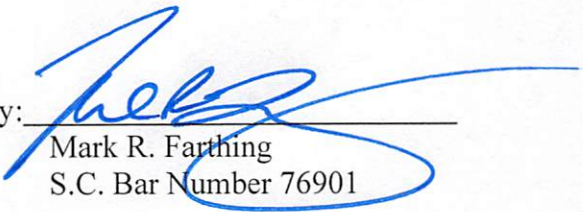
**WHEREFORE**, Respondent prays that the Court extend the deadline for the service and filing of the Initial Brief of Respondent and Designation of Matter in this case for thirty days from the date such relief is granted; hold the matter in abeyance pending a ruling on

Respondent's motion; and grant such other and further relief as the Court may deem just and proper.


Respectfully submitted,

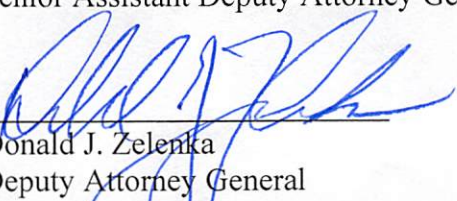
ALAN WILSON  
Attorney General

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

By:   
Donald J. Zelenka  
Deputy Attorney General

January 18, 2023

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THE STATE,

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Appellant.

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**PROOF OF SERVICE**

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I, Leigh Ann Stone, certify I have served the within Motion for Fourth 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 18th day of January, 2023.

  
LEIGH ANN STONE  
Legal Assistant

## Leigh Ann Stone

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**From:** Leigh Ann Stone  
**Sent:** Wednesday, January 18, 2023 10:56 AM  
**To:** Hudgins, Kathrine  
**Cc:** Mark Farthing; William Blich; Stock, Chris  
**Subject:** State v. Ronzell Bilah Olds (2022-000336)  
**Attachments:** Olds.Fourth Extension Request (IBOR) (03196578xD2C78).PDF

Good Morning Ms. Hudgins,

Attached please find a request for a fourth 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.

Thank you,

**LEIGH ANN STONE**, Legal Assistant  
South Carolina Attorney General's Office  
Criminal Appeals | Post-Adjudication  
Office 803-734-3727  
P.O. Box 11549 | Columbia, SC 29211  
[scag.gov](http://scag.gov)



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