

**RECEIVED**

**Feb 03 2023**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Horry County  
Honorable Edward B. Cottingham, Circuit Court Trial Judge  
Honorable R. Ferrell Cothran, Jr., Circuit Court Motion Judge  
Appellate Case Tracking No. 2021-001271

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The State,

Respondent,

vs.

Jamie Goss,

Appellant.

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

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Respondent, through its undersigned counsel, would respectfully show unto this Court:

I.

The Initial Brief of Respondent and Designation of Matter are due to be served and filed February 3, 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 Respondent moves for a third extension in the above referenced appeal. Due to the issues raised and work required in other cases pending before this Court and the South Carolina Supreme Court, I am unable to complete this brief on time. Since the last extension request was granted by this Court, the undersigned has completed the Initial Brief of Respondent and Designation of Matter in State v. Bolick and State v. Marchbanks, the Return to Petition for Writ of Certiorari in

the Supreme Court's Original Jurisdiction in Perry v. State, and the Return to Petition for Writ of Certiorari in Justice v. State and State v. Eubanks. The undersigned also participated in oral argument for State v. Morales and State v. Carpenter in the South Carolina Supreme Court. The Initial Brief in this case is one of the next briefs the undersigned plans to complete.

III.

This extension request is not intended for purposes of delay, but rather to ensure the Brief is properly researched and prepared. I would, therefore, request a third extension of time within which to serve and file the Initial Brief of Respondent and Designation of Matter.

WHEREFORE, Respondent prays that the Court hold this matter in abeyance until ruling on this motion, and extend the deadline for the service and filing of the Initial Brief of Respondent and Designation of Matter in this case for thirty (30) days from the date such relief is granted; and for such other and further relief as the Court may deem just and proper.


Respectfully submitted,

ALAN WILSON  
Attorney General

WILLIAM M. BLITCH, JR.  
Senior Assistant Deputy Attorney General

I have reviewed and approve this request:

S/Donald J. Zelenka  
DONALD J. ZELENKA  
Deputy Attorney General

  
WILLIAM M. BLITCH, JR.  
S.C. Bar No. 15608  
Office of the Attorney General  
Post Office Box 11549  
Columbia, SC 29211  
(803) 734-3727

February 3, 2023

ATTORNEYS FOR RESPONDENT

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**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
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The State,

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**PROOF OF SERVICE**

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I, Caroline Collins, certify that I have served the Motion for Third Extension of Time to Serve and File Initial Brief of Respondent and Designation of Matter on Appellant by depositing a copy in the US Mail addressed to:

Jamie Goss, *Pro Se* Appellant  
#294885, BLS-0136-A  
Ridgeland Correctional Institution  
Post Office Box 2039  
Ridgeland, South Carolina 29936

I further certify that all parties required by Rule to be served have been served.

This 3<sup>rd</sup> day of February, 2023.



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CAROLINE COLLINS  
Administrative Coordinator  
Office of Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29211  
(803) 734-3727



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ALAN WILSON  
ATTORNEY GENERAL

February 3, 2023

Jamie Goss, *Pro Se* Appellant  
#294885, BLS-0136-A  
Ridgeland Correctional Institution  
Post Office Box 2039  
Ridgeland, South Carolina 29936

**Re: The State v. Jamie Goss**  
**2021-001271**

Dear Mr. Goss,

Enclosed please find a copy of the Motion for Third Extension of Time to Serve and File Initial Brief of Respondent and Designation of Matter in the above-referenced case.

Sincerely,

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

WMB/cc  
Enclosure

cc: The Honorable Jenny A. Kitchings (via electronic filing)