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Mar 06 2023

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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

The State,

Respondent,

vs.

Jamie Goss,

Appellant.

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

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 March 6, 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 fourth 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 Hannon v. State and In the Interest of Khalid J. The undersigned has spent a considerable

amount of time preparing a Petition for Writ of Certiorari and Appendix for the United States Supreme Court in State v. Brewer. The undersigned also has administrative responsibilities as the supervisor of the Criminal Appeals Section at the Attorney General's Office. The Initial Brief in this case is the next brief 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 fourth extension of time within which to serve and file the Initial Brief of Respondent and Designation of Matter.

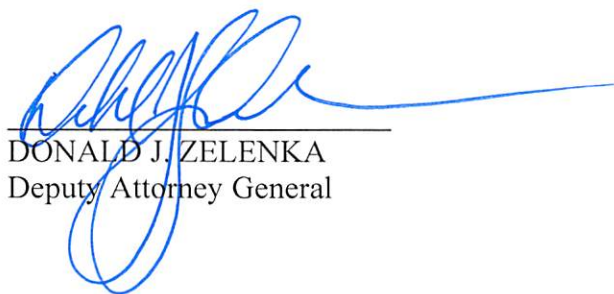
WHEREFORE, Respondent prays that the Court hold this matter in abeyance until ruling on this motion, and extend the deadline for the service and filing of the Initial Brief of Respondent and Designation of Matter in this case for thirty (30) days from the date such relief is granted; and for such other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



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

March 6, 2023

ATTORNEYS FOR RESPONDENT

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STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Horry County
Honorable Edward B. Cottingham, Circuit Court Trial Judge
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The State,

Respondent,

vs.

Jamie Goss,

Appellant.

PROOF OF SERVICE

I, Caroline Collins, certify that I have served the Motion for Fourth 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 6th day of March, 2023.



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



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SC Court of Appeals

ALAN WILSON
ATTORNEY GENERAL

March 6, 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 Fourth 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)