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May 22 2023

SC Court of Appeals

STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Kershaw County
The Honorable Daniel D. Hall, Circuit Court Judge

THE STATE,

Respondent,

v.

CLINTON WARREN BEEBE,

Appellant.

Appellate Case No. 2022-000627

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

The undersigned counsel would respectfully request a thirty (30) day extension in which to file the Initial Brief of Respondent in the above-referenced case. Counsel for Appellant has consented to all extension requests through May 31, 2023. In support of this motion, counsel would respectfully show the Court the following:

Respondent's Initial Brief and Designation of Matter are due today, May 22, 2023 as per this Court's Order dated April 21, 2023 granting Respondent's second extension request. The undersigned attorney for the Respondent has had a number of state and federal matters to attend since April 21, 2023. Specifically,

1. Counsel has been reviewing matters due to his involvement as Chairman on the Office of the Attorney General's Appellate Decision Review Committee. The Committee was formed to review all adverse decisions in Capital, Federal Habeas, Direct Appeals, and Post-Conviction Relief matters, and to determine whether the State will appeal these rulings. In the last thirty days, counsel has reviewed the following matter: State of South Carolina v. Tommy Brown, a Jasper County direct appeal.

2. Counsel filed the Brief of Petitioner and Appendix in the matter of The State v. Devin Jamel Johnson, Appellate Case No: 2023-000131, a Charleston County direct appeal matter on April 25, 2023;

3. Counsel prepared and filed a status report in the matter of Henry Dukes v. Warden, Lee Correctional Institution, C/A No: 4:19-1211-TMC-TER, on April 26, 2023;

4. Counsel prepared and filed the Brief of Petitioner and Appendix in the matter of The State v. Ron "Neal Finklea, Appellate Case No: 2019-001104, a Lexington County death penalty Post-Conviction Relief matter on May 18, 2023;

5. Counsel prepared and filed the Return and Memorandum of Law in Support of Motion for Summary Judgment in the matter of Gene Tony Cooper, Jr. v. Warden Tyger River Correctional Institution, C/A No: 6:23-1170-DCN-KFM, on May 18, 2023.

Also, counsel has had some medical appointments that required him to be out of the office. Due to counsel's involvement in these and other matters, counsel is unable to timely complete the Initial Brief of Respondent.

WHEREFORE, counsel respectfully requests a thirty (30) day extension of time to serve and file the Initial Brief of Respondent and Designation of Matter. This request is made in good faith, and not for the purposes of delay.

Respectfully Submitted,

ALAN WILSON
Attorney General

DONALD J. ZELENKA
Deputy Attorney General

MELODY J. BROWN
Senior Assistant Deputy Attorney General

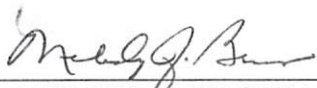
WILLIAM EDGAR SALTER, III
Senior Assistant Attorney General
No. 4806

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(803) 734-6305

By: 
WILLIAM EDGAR SALTER, III
ATTORNEYS FOR RESPONDENT

May 22, 2023.

I support the finding of good cause.

By: 
MELODY J. BROWN,
Senior Assistant Deputy Attorney General

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May 22 2023

SC Court of Appeals

**STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appeal from Charleston County
The Honorable Kristi F. Curtis, Circuit Court Judge

Appellate Case No. 2020-000556

THE STATE,

Respondent,

vs.

CLINTON WARREN BEEBEE,

Appellant.

CERTIFICATE OF SERVICE

I, Angela Brown, am an employee of the Respondent, hereby certify that as per the March 20, 2020 Order of the Chief Justice, the Motion for Extension of Time to File Initial Brief of Respondent and Designation of Matter, and Certificate of Service has been forwarded to Appellant's counsel, Breen R. Stevens, Esquire via email today, May 22, 2023 to bstevens@sccid.sc.gov, and to his assistant Scott Leverette, at lmattthews@sccid.sc.gov.

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

This 22nd day of May, 2023.

s/ Angela Brown

Angela Brown
Legal Assistant to William Edgar Salter, III
Senior Assistant Attorney General