

**RECEIVED**

**Jul 21 2023**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

---

Appeal From Beaufort County  
The Honorable Carmen T. Mullen, Circuit Court Judge

Appellate Case No: 2021-000689

---

STATE OF SOUTH CAROLINA,

Respondent,

vs.

JIOVAANI ARANZA GALLEGOS,

Appellant.

---

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

---

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

I.

The Initial Brief of Respondent and Designation of Matter are due to the Court today, pursuant to two previous extensions granted by the Court.

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 work required in other cases pending before this Court, counsel is unable to complete this Brief on time. Since the last extension was granted in this matter, the undersigned counsel filed a Return to Petition for Writ of Certiorari in Davon Clark v. State of South Carolina (2022-000751) on June 20, 2023. On

the same date, the undersigned counsel represented the State at a PCR hearing held in Spartanburg in Jody Ray Thompson v. State of South Carolina (2022-CP-42-04095). On July 10, 2023, the undersigned counsel submitted a Proposed Order to the Honorable Frank R. Addy, Jr., the presiding judge at the PCR hearing. On July 15, 2023, the undersigned counsel filed an Initial Brief of Respondent and Designation of Matter in The State v. Eryk J'Von Smith (2022-000723). On July 17, 2023, the undersigned counsel filed an Initial Brief of Respondent and Designation of Matter in The State v. Samir Kevin Shank (2022-000650). On July 18, 2023, the undersigned counsel filed a Final Brief of Respondent in The State v. Kelsey Nicole Spurlock (2022-000476). Counsel would therefore request an extension of time within which to serve and file the Initial Brief of Respondent and Designation of Matter.


### III.

This extension request is not intended for purposes of delay, but rather to ensure that the Brief is properly researched and prepared.

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 (30) days; and for such other and further relief as the Court may deem just and proper.

Respectfully submitted,

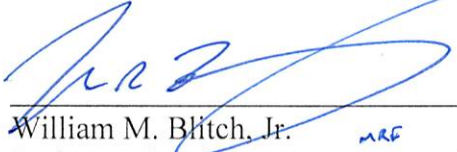
ALAN WILSON  
Attorney General

*for*   
\_\_\_\_\_  
AMBREE MULLER  
Assistant Attorney General  
S. C. Bar No: 104213

Office of the Attorney General  
Post Office Box 11549  
Columbia, SC 29211  
(803) 734-3727

I have reviewed and approved this extension request.

ATTORNEYS FOR RESPONDENT

By:   
\_\_\_\_\_  
*FOR* William M. Blitch, Jr. *MB*  
Senior Assistant Deputy Attorney General

July 21, 2023

**RECEIVED**

**Jul 21 2023**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

---

Appeal From Beaufort County  
The Honorable Carmen T. Mullen, Circuit Court Judge

Appellate Case No: 2021-000689

---

STATE OF SOUTH CAROLINA,

Respondent,

vs.

JIOVAANI ARANZA GALLEGOS,

Appellant.

---

**PROOF OF SERVICE**

---

I, Grace Sommer, certify that I have served the Motion for Extension of Time on Kathrine Hudgins, Esquire, counsel of record for the Appellant, by sending one copy by electronic mail to the address listed for counsel in AIS.

I further certify that all parties required by Rule to be served have been served.  
This 21<sup>st</sup> day of July 2023.



GRACE SOMMER  
Legal Assistant

Office of Attorney General  
Post Office Box 11549  
Columbia, SC 29211  
(803) 734-3737

## Grace Sommer

---

**From:** Grace Sommer  
**Sent:** Friday, July 21, 2023 10:18 AM  
**To:** Hudgins, Kathrine  
**Cc:** Stock, Chris; Ambree Muller  
**Subject:** The State v. Jiovaani Aranza Gallegos (2021-000689)  
**Attachments:** GALLEGOS Jiovaani - Third Extension Motion (IBOR) (03338809xD2C78).PDF

Good Morning 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. Jiovaani Aranza Gallegos (2021-000689). This request is being submitted to the South Carolina Court of Appeals via AIS.

If you will, please reply to confirm receipt of this email.

Thank you!

**Grace Sommer**, Legal Assistant  
South Carolina Attorney General's Office  
Criminal Appeals | Office 803-734-3835 | [gracesommer@scag.gov](mailto:gracesommer@scag.gov)  
P.O. Box 11549 | Columbia, SC 29211  
[scag.gov](http://scag.gov)



*This email, together with any attachments, may be legally privileged. If you have received it in error, please notify the sender immediately, and then delete it from your system. This email and any replies to this email may be subject to disclosure under the Freedom of Information Act.*