

RECEIVED

Aug 10 2023

SC Court of Appeals

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

---

Appeal from Charleston County

Deadra L. Jefferson, Circuit Court Judge

---

THE STATE,

RESPONDENT,

V.

RAHEEM OQUENDAL GRANT,

APPELLANT

APPELLATE CASE NO. 2023-000418

---

MOTION TO FILE EXTENSION REQUEST OUT OF TIME  
AND FOR A THIRTY DAY EXTENSION

---

The undersigned counsel respectfully requests the Court allow counsel to file an extension request to serve and file the initial brief of appellant and designation of matter in the above referenced case out of time. Counsel also respectfully requests a thirty day extension in which to serve and file this brief. In support of this motion, counsel submits the following:

1. The initial brief of appellant and designation of matter were due to be served and filed with this Court on August 4, 2023. No prior extensions have been requested.
2. Due to an administrative error, the first motion for an extension of time to serve and file the initial brief of appellant and designation of matter was served on opposing counsel, William M. Blich, Jr., on August 4, 2023, but not properly filed with this Court. See Exhibit A.

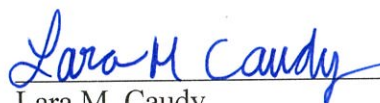
3. Counsel respectfully requests a thirty day extension of time in which to serve and file this brief due to her heavy workload.

4. Counsel makes this request in good faith and not for purposes of delay. Counsel intends to continue to work on cases with more than three extensions first so that her caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

5. On August 1, 2023, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of a general consent granted in writing by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through August 31, 2023.

WHEREFORE, based upon the above showing, counsel for Appellant respectfully requests the Court allow counsel to file an extension request to serve and file the initial brief of appellant and designation of matter in the above referenced case out of time, and for a thirty day extension in which to serve and file this brief.

Respectfully submitted,



Lara M. Caudy  
Appellate Defender

ATTORNEY FOR APPELLANT

August 10, 2023

# **EXHIBIT A**

## Caudy, Lara

---

**From:** Bryant, Hannah  
**Sent:** Friday, August 4, 2023 8:31 AM  
**To:** SC - BLITCH WILLIAM; SC - COLLINS CAROLINE; Caudy, Lara  
**Subject:** Raheem Grant Appellate Case No. 2023-000418 Extension 1  
**Attachments:** Raheem Grant Appellate Case No. 2023-000418 Extension 1.pdf

Dear Mr. Blitch,

Please find attached for service a copy of the first extension in the above referenced case, which will be filed in the Court of Appeals today.

**Hannah Bryant**  
Administrative Assistant  
South Carolina Commission on Indigent Defense  
Division of Appellate Defense  
1330 Lady Street, Suite 401  
(803)-734-1330

---

This communication and any attachment thereto is intended only for use by the addressee(s) named herein, and may contain legally privileged and/or confidential information. If you are not the intended recipient of this e-mail, you are hereby notified that any dissemination, utilization, distribution or copying of this e-mail, and any attachments thereto, is strictly prohibited. If you have received this e-mail in error please notify the Commission on Indigent Defense immediately and permanently delete the original and any copy of any e-mail and any printout thereof. SCCID may be reached by using the email address of the sender, or at 803-734-1343.



SOUTH CAROLINA COMMISSION ON INDIGENT DEFENSE

Division of Appellate Defense  
1330 Lady Street, Suite 401  
Columbia, South Carolina 29201-3332

Post Office Box 11589  
Columbia, South Carolina 29211-1589  
Telephone: (803) 734-1330  
Facsimile: (803) 734-1345

Robert M. Dudek, Chief Appellate Defender  
Wanda H. Carter, Deputy Chief Appellate Defender

August 4, 2023

The Honorable Jenny Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

Re: The State v. Raheem Oquendal Grant  
Appellate Case No.2023-000418

Dear Ms. Kitchings:

The initial brief of appellant and designation of matter in the above-referenced case are due to be served and filed today. Because of my present workload, I respectfully request a thirty (30) day extension of this deadline. No prior extensions have been requested in this case.

On August 1, 2023, opposing counsel, the Attorney General's office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through August 31, 2023.

Thank you for your cooperation and assistance in this matter.

Sincerely,

Lara M. Caudy  
Appellate Defender

LMC/hb

cc: William M. Blich, Jr., Esquire

**RECEIVED**

**Aug 10 2023**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

---

Appeal from Charleston County

Deadra L. Jefferson, Circuit Court Judge

---

THE STATE,

RESPONDENT,

V.

RAHEEM OQUENDAL GRANT,

APPELLANT


APPELLATE CASE NO. 2023-000418

---

CERTIFICATE OF SERVICE

---

Pursuant to Rule 262(a)(3) and Rule 262(c)(3), SCACR, the undersigned hereby certifies a true copy of the Motion to File Extension Request Out of Time and for a Thirty Day Extension in the above referenced case has been served upon William M. Blich, Jr., Esquire, at the primary email address listed in the Attorney Information System (AIS), this 10th day of August, 2023.



---

Lara M. Caudy  
Appellate Defender

ATTORNEY FOR APPELLANT

**From:** [Bryant, Hannah](#)  
**To:** [SC - BLITCH WILLIAM](#); [SC - COLLINS CAROLINE](#); [Caudy, Lara](#)  
**Subject:** Raheem Grant Appellate Case No. 2023-000418 Motion to File Extension Out of Time  
**Date:** Thursday, August 10, 2023 9:55:00 AM  
**Attachments:** [Motion to File Extension Out of Time.pdf](#)

---

Dear Mr. Blitch,

My previous email containing the Motion to File Extension Out of Time in the above referenced case contained an error, please find attached the corrected document.

**Hannah Bryant**

Administrative Assistant  
South Carolina Commission on Indigent Defense  
Division of Appellate Defense  
1330 Lady Street, Suite 401  
(803)-734-1330