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Aug 23 2023

SC Court of Appeals

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Greenville County

Perry H. Gravely, Circuit Court Judge

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THE STATE,

RESPONDENT,

V.

SOSA MANDIEZ CROFT,

APPELLANT.

APPELLATE CASE NO. 2022-001771

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MOTION FOR AN EXTENSION OF TIME TO  
SERVE AND FILE THE INITIAL BRIEF OF APPELLANT  
AND DESIGNATION OF MATTER

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Counsel for appellant respectfully requests a thirty (30) day extension, in which to serve and file the Initial Brief of Appellant and Designation of Matter in this case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. This is a third request for an extension. In support of this request, counsel shows:

1. The Initial Brief of Appellant and Designation of Matter in this case are due to be served and filed today.

2. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of State v. Sidney Stclair Mooror with the Supreme Court on August 18, 2023. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Jaylen Bell with the

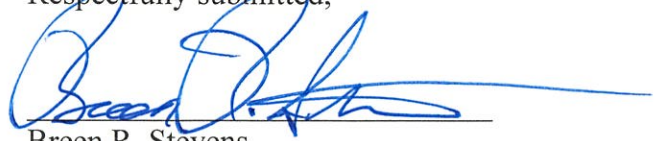
Court of Appeals on August 14, 2023. Counsel filed the initial brief of appellant and designation of matter in the case of State v. David Hayden with the Court of Appeals on July 24, 2023. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Quayshaun X. Clark with the Court of Appeals on July 14, 2023. Counsel attended the Public Defenders 103: Trial Skills Workshop from July 5-7, 2023, in Greenville, SC. Counsel filed the petition for rehearing in the case of State v. Sidney Stclair Moorer with the Court of Appeals on June 22, 2023.

3. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested. Counsel filed the brief of respondent in the case of State v. Demontay M. Payne with the Supreme Court on June 15, 2023. Counsel filed the brief of respondent in the case of State v. Devin Jamel Johnson with the Supreme Court on June 14, 2023.

4. 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.

WHEREFORE, the undersigned counsel would respectfully request a thirty (30) day extension. Counsel respectfully requests that the time limits for serving and filing the Initial Brief of Appellant and Designation of Matter be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Breen R. Stevens  
Appellate Defender



Robert M. Dudek  
Chief Appellate Defender

This 23rd day of August, 2023.

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CERTIFICATE OF SERVICE

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Pursuant to Rule 262(a)(3) and Rule 262(c)(3), SCACR, the undersigned hereby certifies a true copy of the Motion for Extension in the above-referenced case has been served upon David Spencer, Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), this 23rd day of August, 2023.



Breen R. Stevens  
Appellate Defender

ATTORNEY FOR APPELLANT

**From:** [Leverett, Scott](#)  
**To:** [SC - SPENCER DAVID](#)  
**Cc:** [SC - MUELLER VIRGINIA](#); [Stevens, Breen](#)  
**Subject:** Sosa Mandiez Croft - Extension 3 - Appellate Case No. 2022-001771  
**Date:** Wednesday, August 23, 2023 1:46:00 PM  
**Attachments:** [Sosa Mandiez Croft - Extension 3 - Appellate Case No. 2022-001771.pdf](#)

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Dear Mr. Spencer,

Attached please find a copy of the third extension in the above referenced case that is being filed today, August 23, 2023, with the Court of Appeals.

-Scott Leverett  
Admin. Asst. for Breen Stevens  
Appellate Defense