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Sep 01 2023

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Abbeville County
Honorable Walton J. McLeod, IV, Circuit Court Judge
Appellate Case No. 2022-000333

THE STATE,

Respondent,

vs.

REGINALD DA'ARON CAMPBELL,

Appellant.

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

Respondent (“the State”), through its undersigned counsel, would respectfully show unto the Court as follows:

I.

The Initial Brief of Respondent and Designation of Matter are due to be served and filed on September 1, 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 State moves for a **third** extension in the above-referenced criminal appeal and asks for an additional thirty days to complete the brief in this case. In the past few weeks, the undersigned counsel has filed a Return to Petition for Writ of Certiorari in the Supreme Court in

State v. Keunte Cobbs and State v. Gary Martin Wirtz; filed an Initial Brief of Respondent and Designation of Matter in the Court of Appeals in State v. Joseph Martin Swaringen and State v. Kendrick Tremain Blackwell; and has filed a Final Brief of Respondent in the Court of Appeals in State v. Maxie Paul Wagner. Additionally, the undersigned counsel has assumed representation of the State in the post-conviction relief matter of Justin Tyler Young v. State following the State's receipt of an adverse ruling on July 17, 2023, reviewed the record in that matter, and submitted a "Respondent's Motion to Reconsider, Alter, or Amend Pursuant to Rule 59(e), SCRCP" on behalf of the State. Furthermore, the undersigned counsel obtained the transcript from the circuit court proceedings in the pending State's appeal of State v. Timothy Jermaine Miller and, following review and consultation, submitted a motion seeking for the appeal to be withdrawn. Along with that and other responsibilities—including supervisory and administrative ones—in the office, the undersigned counsel has also participated in mandatory training related to leadership skills and has undergone training related to annual accountability reports.

III.

The undersigned counsel submits this extension request is supported by good cause and is not intended for purposes of delay. The Brief in the above-referenced case has required significant research because the case involves three important issues on appeal. The undersigned counsel is currently working on the Brief in this case and intends to have it finished in a timely manner. However, the undersigned counsel has not yet been able to finish the Brief due to a heavy workload, challenges that have resulted from staffing issues that continue to be experienced by the undersigned counsel's office, and other responsibilities necessitated by William M. Blicht, Jr.'s recent departure from the office following his acceptance of the position

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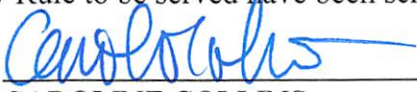
Appellant.

PROOF OF SERVICE

I, Caroline Collins, certify I have served the within Motion for Third Extension of Time Within Which to Serve and File Initial Brief of Respondent and Designation of Matter on Appellant by sending an electronic copy via email to the address listed in AIS for the following individual:

Elizabeth Anne Franklin-Best & Megan E. Johnson, Esquires
Elizabeth Franklin-Best, P.C.
3710 Landmark Drive, Suite 113
Columbia, South Carolina 29204

I further certify all parties required by Rule to be served have been served.
This 1st day of September, 2023.



CAROLINE COLLINS
Administrative Coordinator
Office of the Attorney General

Caroline Collins

From: Caroline Collins
Sent: Friday, September 1, 2023 3:19 PM
To: elizabeth@franklinbestlaw.com; meagan@franklinbestlaw.com
Cc: Mark Farthing
Subject: The State v. Reginald Da'Aron Campbell (2022-000333)
Attachments: Campbell.Third Extension Request (IBOR) (03378516xD2C78).PDF

Good Afternoon Ms. Franklin-Best and Ms. Johnson,

Attached please find a motion 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. Reginald Da'Aron Campbell (2022-000333). This motion will be filed today with the South Carolina Court of Appeals via the AIS OneDrive System.

If you will, please confirm receipt of this email.

Thank you,

CAROLINE COLLINS, Administrative Coordinator
South Carolina Attorney General's Office
Criminal Appeals | Office 803-734-3723 | ccollins@scag.gov
P.O. Box 11549 | Columbia, SC 29211
scag.gov



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