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Oct 13 2023

SC Court of Appeals

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Spartanburg County

Grace Gilchrist Knie, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

KEITH VINCENT BROWN,

APPELLANT

APPELLATE CASE NO. 2023-000511

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

Counsel for Keith Vincent Brown respectfully requests a thirty (30) day extension from October 13, 2023 until November 13, 2023, 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 Anders Brief of Appellant and Designation of Matter in the case of The State v. Henry Wayne Parker with the Court of Appeals on October 11, 2023. Counsel

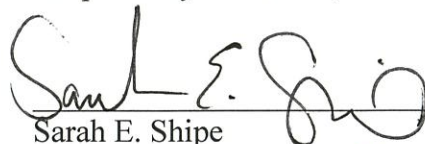
attended the Annual Public Defender Conference from October 9, 2023 until October 11, 2023. Counsel filed the Petition for Writ of Certiorari, Brief of Appellant Pursuant to White v. State, and the Appendix in the case of Brian Foster v. State with the Supreme Court on October 3, 2023. Counsel filed the Brief of Petitioner in the case of Raphael L. Pontoo v. The State with the Court of Appeals on September 18, 2023. Counsel filed the Return to the Petition for Rehearing in the case of The State v. Carmie Josette Nelson with the Supreme Court on September 8, 2023. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Narkevious M. Reid with the Court of Appeals on September 6, 2023. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Christopher Campbell v. The State with the Supreme Court on August 25, 2023. Counsel filed the Anders Brief of Appellant, Designation of Matter, and Record on Appeal in the case The State v. Hakeem Sexton with the Court of Appeals on August 18, 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.

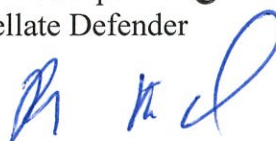
4. On October 3, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through October 31.

WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension from October 13, 2023 until November 13, 2023. Counsel respectfully requests that the time limits for filing the Initial Brief of Appellant and Designation of Matter be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Sarah E. Shipe
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 13th day of October, 2023.

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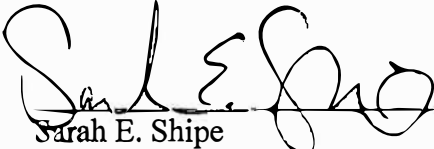
KEITH VINCENT BROWN,

APPELLANT

APPELLATE CASE NO. 2023-000511

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 for Extension in the above-referenced case has been served upon Mark Farthing, Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), this 13th day of October, 2023.


Sarah E. Shipe
Appellate Defender

ATTORNEY FOR APPELLANT

From: [Mcinnis, Sara](#)
To: [Mark Farthing](#)
Cc: ccollins@scag.gov; [Shipe, Sarah](#)
Subject: 2023-000511 The State v. Keith Vincent Brown Extension 3
Date: Friday, October 13, 2023 8:42:00 AM
Attachments: [2023-000511 The State v. Keith Vincent Brown Extension 3.pdf](#)

Good Morning Mr. Farthing,

Please find attached the third motion for extension of time within which to file the Initial Brief of Appellant and Designation of Matter in the above-referenced case. This request will be filed with the Court of Appeals today, October 13, via email filing.

Thank you!

Sara

Sara McInnis

Administrative Assistant
South Carolina Commission on Indigent Defense
Appellate Division
(803) 734-1330