

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Charleston County

Deadra L. Jefferson, Circuit Court Judge

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**RECEIVED**

**Nov 06 2023**

**SC Court of Appeals**

THE STATE,

RESPONDENT,

V.

RAHEEM OQUENDAL GRANT,

APPELLANT

APPELLATE CASE NO. 2023-000418

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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 Raheem Grant, respectfully requests a **fourth and final thirty (30) day extension until December 6, 2023**, in which to serve and file the Initial Brief of Appellant and Designation of Matter in the above-referenced case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. This is a fourth 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 with the Court today. The Court has granted counsel three previous extensions.
2. Counsel for Raheem Grant, respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of

extensions previously granted and the order in which counsel attempts to manage her caseload, counsel hopes that no further extension requests will be required.


3. On November 1, 2023, counsel filed the petition for writ of certiorari and accompanying appendix in Edward Washington v. State with the Supreme Court. On October 18, 2023, counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in Dominic Leggette v. The State with the Supreme Court. From October 9, 2023 through October 11, 2023, counsel attended the Annual Public Defender Conference in Myrtle Beach. On October 6, 2023, counsel filed the initial brief of appellant and designation of matter in The State v. Thomas Henry Brown, Jr. with the Court of Appeals. On September 28, 2023, counsel filed the petition for writ of certiorari and accompanying appendix in Justin Watts v. The State with the Supreme Court. On September 26, 2023, counsel filed an amended petition for writ of certiorari to the Court of Appeals in The State v. Tammy Caison Moorer with the Supreme Court. On September 25, 2023, counsel filed the petition for writ of certiorari and accompanying appendix in Charles Adams v. The State with the Supreme Court. On September 14, 2023, counsel had an oral argument in James Carrier v. The State before the Court of Appeals. On September 5, 2023, counsel filed the initial brief of appellant and designation of matter in The State v. Brian Redding with the Court of Appeals.


4. Counsel makes this request in good faith and not for purpose 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.


5. On October 31, 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 November 30, 2023.

WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension** until **December 6, 2023**, in which to serve and file the Initial Brief of Appellant and Designation of Matter in this case based upon the above exigent circumstances.

Respectfully submitted,

  
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Lara M. Caudy  
Appellate Defender

  
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Robert M. Dudek  
Chief Appellate Defender

  
\_\_\_\_\_  
J. Hugh Ryan, III  
Executive Director/  
Hervey B. O. Young  
Deputy Director and General Counsel/  
W. Lawrence Brown  
Deputy General Counsel and Training Director

This 6th day of November, 2023.

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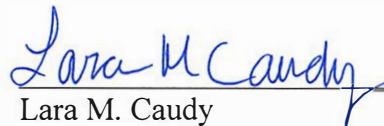
RAHEEM OQUENDAL GRANT,

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 that a copy of the Motion for an Extension of Time to Serve and File the Initial Brief of Appellant and Designation of Matter in the above referenced case has been served upon Mark Farthing, Esquire, at the primary email address listed in the Attorney Information System (AIS), this 6th day of November, 2023.



Lara M. Caudy  
Appellate Defender

ATTORNEY FOR APPELLANT