

**RECEIVED**

**Nov 13 2023**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
Court Of General Sessions  
The Honorable Perry H. Gravely, Circuit Court Judge

Appellate Case No: 2022-001287

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THE STATE,

Respondent,

vs.

EUGENE TURNER, JR.,

Appellant.

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**MOTION FOR EXTENSION OF TIME**

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Respondent, through its undersigned counsel, would respectfully show unto this Court as follows:

I.

The Initial Brief Of Respondent and Designation Of Matter are due to the Court today, pursuant to four previous extensions granted by the Court.

II.

Due to work required in other cases pending before this Court and the South Carolina Supreme Court, I am unable to complete this brief and designation on time. Since my last request for an extension in this matter, I have completed and filed the Final Brief Of Respondent in State v. Donald Pollock (2022-000485) on October 19, 2023; the Initial Brief and Designation of Matter in State v. Nevelle Joshua Eberhart (2023-000234) on October 20, 2023; Returns To

Petitions For Writ Of Certiorari in Tammy Moorer v. State (2018-001938) on October 26, 2023 and in Geordi Heyward v. State (2022-000710) on October 30, 2023. In addition, I represented and argued for the State before this Court in Carnie Norris v. State (2019-000334) on November 7, 2023. I would therefore request an extension of time within which to serve and file the Initial Brief Of Respondent and Designation Of Matter.


III.

This extension request is not intended for purposes of delay, but rather to ensure that the Brief is properly researched and prepared.

WHEREFORE, Respondent prays that the Court extend the deadline for the service and filing of the Initial Brief Of Respondent and Designation Of Matter in this case for thirty (30) days; and for such other and further relief as the Court may deem just and proper.

Respectfully submitted,


ALAN WILSON  
Attorney General

  
\_\_\_\_\_  
JOSHUA A. EDWARDS  
Assistant Attorney General  
S. C. Bar No: 101188

Office of the Attorney General  
Post Office Box 11549  
Columbia, SC 29211  
(803) 734-3727

ATTORNEYS FOR RESPONDENT

I have reviewed and approve this extension request.

By:   
\_\_\_\_\_  
Mark R. Farthing  
Senior Assistant Deputy Attorney General

By: /s/ DONALD J. ZELENKA  
Donald J. Zelenka  
Deputy Attorney General

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**PROOF OF SERVICE**

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I, Anne Mueller, certify that I have served the within Motion For Extension Of Time on Adam Blake McCoy, Esquire, and Miles E. Coleman, Esquire, counsel of record for the Appellant, by electronic mail to the address listed for each counsel in AIS.

I further certify that all parties required by Rule to be served have been served.  
This 13<sup>th</sup> day of November 2023.



Anne A. Mueller  
Legal Assistant

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