

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Lancaster County

Lawton R. McIntosh, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

RENO RODREIGUS BLAKELY,

APPELLANT

APPELLATE CASE NO. 2023-000218

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

Counsel for Reno Blakely respectfully requests a thirty 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. On November 27, 2023, counsel will file the brief of petitioner in The State v. Nyquan Brown with the Supreme Court. On November 16, 2023, counsel, along with co-counsel, filed a petition for writ of certiorari in State of South Carolina v. Timothy Ray Jones, Jr.

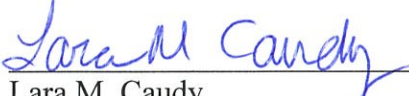
with the United States Supreme Court. On November 15, 2023, counsel had an oral argument in The State v. Montrelle Campbell before the Supreme Court. On November 9, 2023, counsel filed the petition for rehearing in James Carrier v. The State with the Court of Appeals. On November 1, 2023, counsel filed 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.

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.

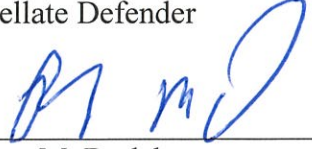
4. On October 31, 2023, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through November 30, 2023.

WHEREFORE, the undersigned counsel would respectfully request a 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,



Lara M. Caudy
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 27th day of November, 2023

RECEIVED

Nov 27 2023

SC Court of Appeals

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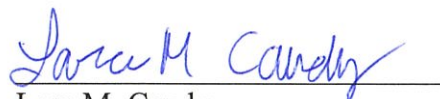
RENO RODREIGUS BLAKELY,

APPELLANT.

APPELLATE CASE NO. 2023-000218

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 Melody J. Brown, Esquire, at the primary email address listed in the Attorney Information System (AIS), this 27th day of November, 2023.



Lara M. Caudy
Appellate Defender

ATTORNEY FOR APPELLANT

From: [Bryant, Hannah](#)
To: [Melody Brown](#); [Summer Etheredge](#); [Caudy, Lara](#)
Subject: Reno Blakely Appellate Case No. 2023-000218 Extension 3
Date: Monday, November 27, 2023 9:48:00 AM
Attachments: [Reno Blakely Appellate Case No. 2023-000218 Extension 3.pdf](#)

Dear Ms. Brown,

Please find attached for service a copy of the third extension in the above referenced case, which will be filed in the Court of Appeals today.

Hannah Bryant

Administrative Assistant
South Carolina Commission on Indigent Defense
Division of Appellate Defense
1330 Lady Street, Suite 401
(803)-734-1330