

RECEIVED

Nov 29 2023

SC Court of Appeals

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Pickens County

Perry H. Gravely, Circuit Court Judge

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THE STATE,

RESPONDENT,

V.

TYCHRISTIAN LADSON,

APPELLANT

APPELLATE CASE NO. 2023-000372

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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 Tychristian Ladson respectfully requests a thirty (30) day extension from November 29, 2023 until December 29, 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 Petition for Rehearing in the case of The State v. Levy Larkin Brown with the Court of Appeals on November 22, 2023. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Franklin Dover v. State with the Supreme Court on


November 20, 2023. Counsel filed the Petition for Rehearing in the case of The State v. Michael Tirrell Means with the Court of Appeals on November 9, 2023. Counsel filed the Johnson Petition for Writ of Certiorari and Appendix in the case of Jerod Harris v. State with the Supreme Court on November 9, 2023. Counsel filed the Return to Petition for Writ of Certiorari in the case of William Oliver Aguilar Pineda v. State with the Supreme Court on November 3, 2023.

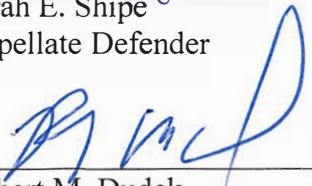
3. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

4. On October 31, 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.

WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension from November 29, 2023 until December 29, 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,

  
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Sarah E. Shipe  
Appellate Defender

  
\_\_\_\_\_  
Robert M. Dudek  
Chief Appellate Defender

This 29th day of November, 2023.

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Honorable Perry H. Gravely, Circuit Court Judge

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THE STATE,

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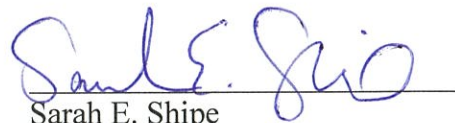
APPELLATE CASE NO. 2023-000372

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CERTIFICATE OF SERVICE

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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 e-mail address listed in the Attorney Information System (AIS), this 29th day of November, 2023.



Sarah E. Shipe  
Appellate Defender

ATTORNEY FOR APPELLANT

**From:** [Mcinnis, Sara](#)  
**To:** [mbrown@scag.gov](mailto:mbrown@scag.gov)  
**Cc:** [Shipe, Sarah](#); [abennett@scag.gov](mailto:abennett@scag.gov)  
**Subject:** 2023-000372 The State v. TyChristian Ladson  
**Date:** Wednesday, November 29, 2023 9:08:00 AM  
**Attachments:** [2023-000372 The State v. TyChristian Ladson Extension 3.pdf](#)

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Good Morning Ms. Brown,

Please find attached the third motion for an extension of time 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, November 29, via email filing.

Thank you!

**Sara McInnis**

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