

**RECEIVED**

**Dec 20 2023**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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Appeal from Jasper County  
The Honorable Robert Bonds, Circuit Court Judge

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THE STATE,

Respondent,

v.

BRIAN JAMEL REDDING,

Appellant.

Appellate Case No. 2022-001213

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**MOTION FOR EXTENSION OF TIME TO FILE  
INITIAL BRIEF OF RESPONDENT AND  
DESIGNATION OF MATTER**

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The undersigned counsel would respectfully request a thirty (30) day extension in which to serve and file the Initial Brief of Respondent and Designation of Matter in the above-referenced case. Opposing counsel has graciously consented to all extensions through December 31, 2023. In support of this motion, counsel would respectfully show the Court the following:

Respondent's Initial Brief and Designation of matter are due today, December 20, 2023, according to this Court's Order dated November 21, 2023, granting Respondent's second extension request. The undersigned attorney for the Respondent, however, has had a number of state and federal matters to attend since November 21, 2023. Specifically:

On November 21, 2023, undersigned counsel completed and filed an amended return and memorandum of law in support of motion for summary judgment in a non-capital federal habeas action (*Edward Stackhouse*); on November 28, 2023, completed a draft order of dismissal and circulated same to opposing counsel in a non-capital PCR action (*Demossio Valentine*);

November 29, 2023, completed and filed with this court a return to petition for supersedeas (*Ryan Manigo*); on December 5, 2023, prepared and submitted a proposed order denying Applicant's Rule 59 motion in a capital PCR action (*Bayan Aleksey*); on December 7, 2023, attended a motions hearing in family court concerning a waiver hearing on a pending murder charge in Aiken County (*Antonio Jones*), and on that same day completed and submitted a memorandum of law in a pending appeal and petition for supersedeas in this Court (*John Joseph Erb*); on December 11, 2023, completed and filed a Brief of Respondent in a non-capital PCR appeal prepared (*Jason Larson*); on December 12, 2023, reviewed and consulted on a proposed order denying the State's motion to dismiss in another non-capital PCR action (*Michael Richardson*); on December 14, 2023, prepared and filed a status report in a non-capital federal habeas action (*LaShawn Brannon*), which counsel also updated the following day, December 15, 2023; prepared for and attended the continuation of a capital PCR hearing held in York County (*Ricky Blackwell*); on December 18, 2023, completed and filed a response to motion for stay of execution in a capital federal habeas corpus action (*Andre Torres*), and also completed and filed a reply to objections in a non-capital federal habeas corpus action (*Demetrius Glenn*); aided in the drafting and completion of a response to stay proceedings in a capital federal habeas corpus action appeal in the Fourth Circuit Court of Appeals filed on December 20, 2023 (*Steven Bixby*); and also completed, circulated and submitted proposed orders of dismissals in other non-capital PCR actions (*Steven Williams, Marquel Griffin*); prepared proposed final orders of dismissal in several other non-capital PCR actions (*Rodrick Johnson; Kenneth Rivera; and Charles Stokes*), in addition to continuing to prepare for various capital and non-capital hearings currently scheduled to held in January 2024. Additionally, counsel is also currently drafting another final order of dismissal in a non-capital PCR action (*Orlando Parker*); working on a return to

amended petition in capital federal habeas corpus action (*William Dickerson*); and has a mandatory brief in opposition to be filed on or before January 22, 2024, in the Supreme Court of the United States in a capital case (*Timothy Ray Jones, Jr.*).

Due to counsel's involvement in these and other matters, counsel is unable to timely complete the Initial Brief of Respondent and Designation of Matter. However, cognizable of the prior extensions, counsel advises that she has associated the assistance of another attorney in preparation of the brief.

WHEREFORE, counsel respectfully requests a thirty (30) day extension of time to serve and file the Initial Brief of Respondent and Designation of Matter. This request is made in good faith, and not for the purposes of delay.


Respectfully Submitted,

ALAN WILSON  
Attorney General

DONALD J. ZELENKA  
Deputy Attorney General

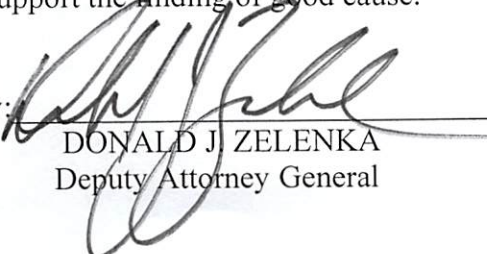
MELODY J. BROWN  
Senior Assistant Deputy Attorney General  
S.C. Bar No: 14244

Post Office Box 11549  
Columbia, South Carolina 29211  
(803) 734-6305

By:   
MELODY J. BROWN  
ATTORNEYS FOR RESPONDENT

December 20, 2023

I support the finding of good cause.

By:   
DONALD J. ZELENKA  
Deputy Attorney General

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**PROOF OF SERVICE**

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I, Angela Brown, am an employee of the Respondent, hereby certify that as per the March 20, 2020 Order of the Chief Justice, the Motion for Extension Time, and Certificate of Service has been forwarded to Appellant's counsel, Breen Stevens, Esquire via email today, December 20, 2023 to [Lcaudy@sccid.sc.gov](mailto:Lcaudy@sccid.sc.gov), and to her assistant Hannah Bryant, at [Hbryant@sccid.sc.gov](mailto:Hbryant@sccid.sc.gov).

I further certify that all parties required by Rule to be served have been served.

This 20<sup>th</sup> day of December, 2023.

*s/ Angela Brown*

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Angela Brown  
Legal Assistant to Melody J. Brown  
Senior Assistant Deputy Attorney General