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Mar 04 2024

SC Court of Appeals

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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Appeal from Charleston County  
The Honorable Bently Price, Circuit Court Judge

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THE STATE,

Respondent,

v.

MAURICE TRIMAIN SINGLETON,

Appellant.

Appellate Case No. 2023-000553

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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 an 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 March 30, 2024. This is the third request for an extension. In support of this motion, counsel would respectfully show the Court the following:

Respondent's Initial Brief and Designation of Matter are due today, March 4, 2024, according to this Court's Order dated February 7, 2024, granting Respondent's second extension request. Undersigned counsel for Respondent has had a number of state and federal matters to attend since February 2, 2024, that have hampered progress on the brief. Specifically, counsel has, in the last thirty days: prepared and submitted a proposed order of dismissal in a PCR matter and also reviewed and submitted argument on proposed changes (*Jeremy Watson*); prepared and

attended a status and scheduling conference in a capital PCR matter, and also continued in hearing preparation for a June hearing on intellectual disability (*Bobby Wayne Stone*); prepared for and presented oral argument in a non-capital PCR appeal in this Court (*Jerald Gaskins*); reviewed a state's appeal pending in this Court (*Michael Hutson*); prepared and filed a motion to reconsider a discovery order in a general sessions motion for a new trial, and reply to the response in opposition, and also prepared and filed a motion to stay time limits and a proposed order granting the State's motion to stay time limits of the discovery order (*Charles Wakefield*); reviewed and added to an initial brief of respondent filed in this Court in another non-capital murder direct appeal (*Brian Redding*); prepared and filed a reply to the response in opposition to the Warden's motion to strike in a capital federal habeas action (*William Dickerson*); prepared and filed a motion to dismiss due to inmate's death in a non-capital federal habeas action (*Trey Brown*); prepared and filed in the Supreme Court of South Carolina a letter response to an original jurisdiction petition (*Jerome Long*); prepared and filed a supplement to reply in a non-capital federal habeas corpus action (*James McClurkin*); prepared and filed several returns in non-capital PCR actions (*Tristan Cummings; Jahru Smith; Matthew Bryan; Vernon Jordan; Ronald Downs; Bradford Williams*); and returns with motions to dismiss and proposed conditional orders in two others (*Patrick Scott; Quasean Marshall*); along with a motion to strike substantive matters by one of the applicants listed who is currently represented by counsel (*Jahru Smith*). Respondent also completed a draft of a proposed order of dismissal in another non-capital PCR action and submitted same to opposing counsel for initial review prior to submission to the PCR judge (*Jakobe German*); and is completing a return to a petition for writ of certiorari in a non-capital murder direct appeal which is currently due to be filed today in the Supreme Court of South Carolina (*Rashawn Little*). Respondent has also continued to review the instant matter and has completed a significant portion

of the necessary research. However, counsel's involvement in the other matters as listed above has prevented counsel from timely completing the brief for filing.

This request is made from necessity and not for the purpose of simple delay.

WHEREFORE, counsel respectfully requests a thirty (30) day extension of time to serve and file the Initial Brief of Respondent and Designation of Matter.


Respectfully Submitted,

ALAN WILSON  
Attorney General

DONALD J. ZELENKA  
Deputy Attorney General

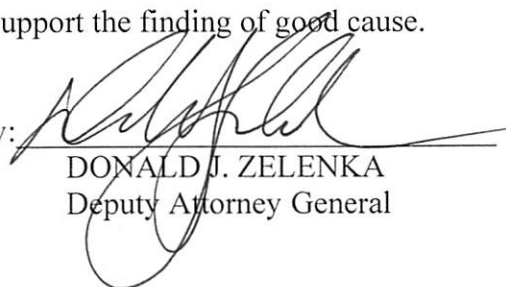
MELODY J. BROWN  
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(803) 734-6305

By:   
MELODY J. BROWN  
ATTORNEYS FOR RESPONDENT

March 4, 2024.

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, Kathrine H. Hudgins, Esquire via email today, March 4, 2024 to [KHudgins@sccid.sc.gov](mailto:KHudgins@sccid.sc.gov), and to her assistant Chris Stock, at [Cstock@sccid.sc.gov](mailto:Cstock@sccid.sc.gov).

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

This 4<sup>th</sup> day of March, 2024.

*s/ Angela Brown*

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