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Mar 27 2024

SC Court of Appeals

STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Spartanburg County
Honorable Grace Gilchrist Knie, Circuit Court Judge

Appellate Case No: 2023-000511

THE STATE.

Respondent,

v.

KEITH VINCENT BROWN,

Appellant.

MOTION FOR EXTENSION OF TIME

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

I.

Appellant has appealed his convictions for burglary in the first degree and petit larceny.

II.

The Initial Brief of Respondent and Designation of Matter in this case are due to be served and filed this Friday, March 29, 2024, pursuant to a second extension request granted by this Court.

III.

The undersigned counsel's workload has been such that she will not be able to meet the March 29 deadline.

IV.

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

V.

The undersigned counsel has spoken with, Sarah E. Shipe, counsel for Appellant, and she consents to the extension requested.

WHEREFORE, Respondent prays that the Court extend the deadline for the service and filing of the Initial Brief of Respondent and Designation of Matter for thirty (30) days from March 29, 2024, to April 28, 2024; hold the matter in abeyance pending a ruling on Respondent's motion; and grant such other and further relief as the Court may deem just and proper.

Respectfully submitted,

ALAN WILSON
Attorney General

MARK R. FARTHING
Senior Assistant Deputy Attorney General

AMIE L. CLIFFORD
Special Assistant Attorney General

BARRY J. BARNETTE
Solicitor, Seventh Judicial Circuit

By: 

Amie L. Clifford
S.C. Bar Number 1285

I have reviewed and approved this extension request.

By: 

Mark R. Farthing
Senior Assistant Deputy Attorney General

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PROOF OF SERVICE

I, Grace Sommer, certify I have served the within Motion for Extension of Time on Appellant by sending an electronic copy via email to the addresses listed in AIS for the following individuals:

Sarah Elizabeth Shipe, Esquire
S.C. Commission on Indigent Defense
1330 Lady Street, Suite 401
Columbia, South Carolina 29201

I further certify all parties required by Rule to be served have been served.
This 27th day of March, 2024.


GRACE SOMMER
Legal Assistant
Office of the Attorney General