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Apr 09 2024

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Lexington County
The Honorable Debra R. McCaslin, Circuit Court Judge

THE STATE,

Respondent,

v.

JEREMY SAVOY CORNISH,

Appellant.

Appellate Case No. 2022-001536

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

The undersigned counsel would respectfully request a thirty (30) day extension up to and including May 13, 2024, in which to file the Initial Brief of Respondent and Designation of Matter in the above-referenced case. Opposing counsel has graciously consented to all requests through April 31, 2024. In support of this motion, counsel would respectfully show the Court the following:

Respondent's Initial Brief and Designation of Matter is due Wednesday, April 12, 2024, as per this Court's Order dated March 11, 2024, granting Respondent's third extension request. The undersigned attorney for the Respondent has had a number of state and federal matters to attend since March 11, 2024. Specifically,

1. Counsel completed and filed the *Final Brief of Respondent* and *Certificate of Compliance* on March 18, 2024, in the case of The State v. Justin Tyler Ellaree Hopkins, Appellate Case No. 2022-001567, a murder appeal from Lexington County, Appellate Case No. 2022-001567, a matter pending in this Court;
2. Counsel completed and filed the *Return and Memorandum of Law in Support of Motion for Summary Judgment* on March 22, 2024, in the matter of Christopher Broadnax, #099356 v. Warden Shane Jackson, C/A No. 4:24-cv-531-DCN-TER, a matter pending in the District Court;
3. Counsel completed and filed the *Reply to Response to Motion for Summary Judgment* on March 28, 2024, in the matter of Dominic A. Gallman v. Bryan Sterling, Commissioner, South Carolina Department of Corrections, and Kenneth Nelson, Warden, Broad River Correctional Institution, a matter pending in the District Court;
4. Counsel completed and filed the *Final Brief of Respondent* and *Certificate of Compliance* on April 8, 2024, in the case of The State v. Quinton Maurice Collins, Appellate Case No. 2023-000366, a murder appeal from Pickens County, a matter pending in this Court;
5. Counsel is working on the *Return and Memorandum of Law in Support of Motion for Summary Judgment* due Friday, April 12, 2024, in the matter of Miguel Urena v. Shane Jackson, Warden Lee Correctional Institution, C/A No. 5:23-cv-5202-JK-KDW;
6. Counsel is continuing to work on and prepare for an *Evidentiary Hearing* for the week of June 10, 2024 regarding Intellectual Disability in the matter of Bobby Wayne Stone v. Bryan P. Stirling, Commissioner South Carolina Department of Corrections, and Lydell Chestnut, Deputy Warden, Broad River Correctional Institution, a matter pending in the Circuit Court.

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


TOMMY EVANS, JR.
Assistant Attorney General
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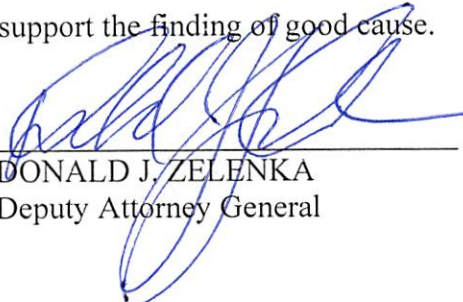
By: s/Tommy Evans, Jr.
Tommy Evans, Jr.

April 9, 2024.

I support the finding of good cause.

By: 
MELODY J. BROWN
Senior Assistant Deputy Attorney General

I too support the finding of good cause.

By: 
DONALD J. ZELENKA
Deputy Attorney General

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PROOF OF SERVICE

I, Tommy Evans, Jr., hereby certify that as per the March 20, 2020 Order of the Chief Justice, the Respondent's fourth Motion for Extension and Proof of Service have been forwarded to Appellant's counsel, Breen Richard Stevens, Esquire, via email today, March 11, 2024 to BStevens@sccid.sc.gov, and to his assistant, Scott Leverett, to SLeverett@sccid.sc.gov.

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

This is the 9th day of April 2024.

s/Tommy Evans, Jr.
Tommy Evans, Jr.
Assistant Attorney General