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Apr 12 2024

SC Court of Appeals

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Beaufort County
The Honorable Brooks P. Goldsmith, Circuit Court
Judge Appellate Case No. 2023-000475

THE STATE,

Respondent,

vs.

THOMAS LOUIS DAVIS,

Appellant.

**MOTION FOR SIXTH EXTENSION OF TIME WITHIN WHICH
TO SERVE AND FILE INITIAL BRIEF OF RESPONDENT
AND DESIGNATION OF MATTER**

Respondent, State of South Carolina, hereby moves for a sixth extension of time to file the Initial Brief of Respondent and Designation of Matter to be included in the Record on Appeal.

Respondent submits the following:

1. The Initial Brief of Respondent and Designation of Matter are due to be filed and served April 12, 2024, pursuant to a fifth extension. Respondent requests a **sixth** extension to serve and file these documents, which is not made for the purpose of delay but supported by extraordinary circumstances including a heavy workload and counsel being out of the office due to illness. Counsel was unexpectedly out of the office due to illness from March 7 to March 18th. In addition, counsel was required to be out of the office attending meetings and hearings in the

South Carolina Senate. Last week, Counsel was out of office due to her husband being admitted into the hospital. Currently, Counsel is out of the office due to an illness relapse.

2. Counsel has worked on the Initial Brief and Designation of Matter but has been unable to complete the Brief prior to the due date. Counsel assures the Court completion of the Brief is a high priority, and she will work diligently to complete it.

Based on the foregoing, counsel for Respondent respectfully requests that this Court grant a 30-day extension in which to file and serve the Initial Brief of Respondent and Designation of Matter in this case, and that all deadlines be held in abeyance pending resolution of this Motion.

Respectfully submitted,

ALAN WILSON
Attorney General

DEBORAH R.J. SHUPE
Senior Assistant Deputy Attorney General

BY: 

Deborah R.J. Shupe

Office of the Attorney General
Post Office Box 11549
Columbia, SC 29211
(803) 734-3970

I have reviewed and approved this extension request.

DONALD J. ZELENKA
Deputy Attorney General

BY: 

Donald J. Zelenka

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PROOF OF SERVICE

I, Caroline Collins, certify that I have served the Motion for Extension of Time on Jared S. Newman, Esquire, counsel of record for the Appellant, by sending it to him by electronic mail to the address listed for counsel in AIS.

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

This 12th day of April, 2024.



Caroline Collins
Administrative Coordinator

Office of Attorney General
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(803) 734-3737