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**Apr 15 2024**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal From Greenville County  
The Honorable G.D. Morgan, Jr., Circuit Court Judge

Appellate Case No: 2023-000483

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STATE OF SOUTH CAROLINA,

Respondent,

vs.

LILLIAN MAE BATES,

Appellant.

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**MOTION FOR EXTENSION**

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

I.

The Initial Brief of Respondent and Designation of Matter are due to the Court today, pursuant to two previous extensions granted by the Court.

II.

Pursuant to RE: Extension Requests in Criminal Direct Appeals and Post-Conviction Relief Certiorari Proceedings: Order of the South Carolina Supreme Court dated March 18, 2009, the Respondent moves for a third extension in the above referenced appeal. Due to work required in other cases pending before this Court, I am unable to complete this Brief on time. Since the last extension was requested in this matter, I have filed with this Court a Petition For Rehearing in State v. Mark Hailey (2020-001276) and an Initial Brief of Appellant in State v. Terrance Frazier (2023-001439). With the Supreme Court, I have filed Returns to Petition for Writ of Certiorari in

State v. Randy Furtick (2023-000241), State v. Andres Posso (2024-000422), and State v. Quintus Faison (2024-000415); a Return to Petition for Original Jurisdiction in State v. Antuwn Turner (2024-000312); and Briefs of Respondent in State v. Rashawn Carter (2023-000632) and State v. Philip Guderyon (2023-000633). I also appeared at oral argument before the Supreme Court in State v. Richard Galloway (2022-000914). I would therefore request an extension of time within which to serve and file the Initial Brief of Respondent and Designation of Matter.


III.

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

WHEREFORE, Respondent prays that the Court extend the deadline for the service and filing of the Initial Brief of Respondent and Designation of Matter in this case for thirty (30) days; and for such other and further relief as the Court may deem just and proper.

Respectfully submitted,

ALAN WILSON  
Attorney General

  
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JOSHUA A. EDWARDS  
Assistant Attorney General

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ATTORNEYS FOR RESPONDENT

I have reviewed and approved this extension request.

By:   
\_\_\_\_\_  
Mark R. Farthing  
Senior Assistant Deputy Attorney General

March 8, 2024

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**PROOF OF SERVICE**

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I, Anne Mueller, certify that I have served the Motion for Extension of Time on Jessica M. Saxon, Esquire, counsel of record for the Appellant, by sending one copy by electronic mail to the address listed for each counsel in AIS.

I further certify that all parties required by Rule to be served have been served.  
This 15<sup>th</sup> day of April 2024.



Anne A. Mueller  
Legal Assistant for the Respondent

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