

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Lancaster County
The Honorable R. Lawton McIntosh, Circuit Court Judge

THE STATE,

Respondent,

v.

RENO RODREIGUS BLAKELY,

Appellant.

Appellate Case No. 2023-000218

**MOTION FOR THIRD 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 June 3, 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 May 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 Friday, May 3, 2024, as per this Court's Order dated April 3, 2024, granting Respondent's second extension request. The undersigned attorney for the Respondent has had a number of state and federal matters to attend to since April 3, 2024. Specifically,

1. 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;

2. Counsel prepared and filed the Respondent's *Return and Motion to Dismiss* and the *Proposed Conditional Order of Dismissal* on April 10, 2024, in the matter of Loras Leroy Rowan, #222144 v. State of South Carolina, C/A No. 2018-CP-23-4978, a matter pending in the Circuit Court;

3. Counsel prepared and filed the Respondent's *Return and Motion to Dismiss* and the *Proposed Conditional Order of Dismissal* on April 10, 2024, in the matter of James Lynch, III, #244917 v. State of South Carolina, C/A No. 2018-CP-23-5660, a matter pending in the Circuit Court;

4. Counsel completed and filed the *Final Brief* and *Certificate of Compliance* on April 11, 2024, in the matter of The State v. Quinton Maurice Collins, Appellate Case No. 2022-000671, a murder appeal from Pickens County, pending in this Court;

5. Counsel prepared and filed the Respondent's *Return and Motion to Dismiss* and the *Proposed Conditional Order of Dismissal* on April 12, 2024, in the matter of Troy Lee Kilgore, #293925 v. State of South Carolina, C/A No. 2018-CP-23-4977, a matter pending in the Circuit Court;

6. Counsel filed the *Return and Memorandum of Law in Support of Motion for Summary Judgment* on 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, a matter pending in the District Court;

7. Pursuant to the Text Order of the Honorable Mary Geiger Lewis, Counsel filed the *Supplemental Reply to Petitioner's Objections to Report and Recommendation* on April 25, 2024, a matter pending in the District Court;

8. Counsel attended an *Intellectual Disability Evaluation* on April 25, 2024, and continues preparation for a June Hearing (now re-scheduled to July) on the issue of intellectual disability in the matter of Gary Dubose Terry v. State of South Carolina, Case No. 2022-CP-32-00924.

9. 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

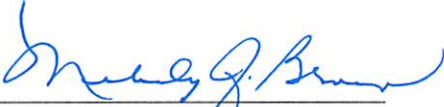
TOMMY EVANS, JR.
Assistant Attorney General
No. 7448

Post Office Box 11549
Columbia, South Carolina 29211
(803) 734-6305

By: s/Tommy Evans, Jr.
Tommy Evans, Jr.

May 1, 2024.

I support the finding of good cause.

By: 
MELODY J. BROWN
Senior Assistant 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 third Motion for Extension and Proof of Service have been forwarded to Appellant's counsel, Lara M. Caudy, Esquire, via email today, May 1, 2024 to LCaudy@sccid.sc.gov, and to her assistant, Sarah McInnis, to SMcInnis@sccid.sc.gov.

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

This is the 1st day of May 2024.

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