

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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

Appellate Case No: 2023-000511

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THE STATE.

Respondent,

v.

KEITH VINCENT BROWN,

Appellant.

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**MOTION FOR FOURTH EXTENSION OF TIME**

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The undersigned counsel for Respondent respectfully requests a fourth extension of fifteen (15) days, in which to serve and file the Initial Brief of Respondent and Designation of Matter in the above-referenced case. This motion is made pursuant to the March 18, 2009 Order of the Supreme Court. In support of this request, counsel shows:

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 today, April 29, 2024, pursuant to a third extension request granted by this Court.

III.

The undersigned counsel submits that extraordinary circumstances exist which

warrant the granting of a fourth and final extension of fifteen (15) days. The undersigned counsel is currently working on the Brief in this case but has not yet been able to finish it due to a heavy workload, which, in addition to her work as a volunteer on this brief, has included time-sensitive contract negotiations and reviews, technical assistance for trial prosecutors, and work on trainings, which includes preparation for presentations to be made this afternoon and tomorrow for summary court judges (2024 Magistrates Advisory Council Intensive Training Seminar).

V.

This extension request is not intended for purposes of delay, but rather to ensure that the brief and designation are properly completed. The undersigned will be able to complete, serve, and file the brief if the requested extension is given.

V.

Assistant Appellate Defender Sarah E. Shipe, Counsel for Appellant, was not available this morning, but, in her absence, Robert M. Dudek, Chief Appellate Defender, graciously consented 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 in this case for fifteen (15) days from the date such relief is granted; 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 MCCRORY WILSON  
Attorney General

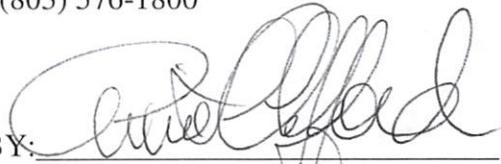
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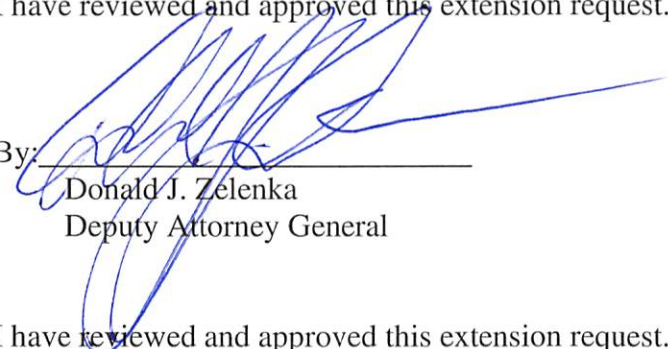
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BY:   
ATTORNEYS FOR RESPONDENT

I have reviewed and approved this extension request.

By:   
Donald J. Zelenka  
Deputy Attorney General

I have reviewed and approved this extension request.

By:   
MARK R. FARTHING  
Senior Assistant Deputy Attorney General

April 29, 2024

Columbia, South Carolina

**RECEIVED**

**Apr 29 2024**

**SC Court of Appeals**

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**PROOF OF SERVICE**

I, Grace Sommer, certify I have served the within Motion for the Fourth Extension of Time within which to serve and file Initial Brief of Respondent and Designation of Matter on Appellant by sending an electronic copy via email to the address listed in AIS for Sarah Elizabeth Shipe, Counsel for Appellant:

Sarah Elizabeth Shipe  
S.C. Commission on Indigent Defense  
1330 Lady Street, Suite 401  
Columbia, South Carolina 29201  
sshipe@sccid.sc.gov

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

This 29th day of April, 2024.



GRACE SOMMER  
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