

**RECEIVED**

**May 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 Letitia H. Verdin, 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 A FOURTH EXTENSION OF TIME**

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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 three 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 fourth 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 a Returns to Petitions for Writ of Certiorari in State v. Andres F. Posso (2022-001396) and State v. Quintus D. Faison (2024-000415); a Brief of Respondent in Cephas Cowick v. State (2022-001155); and Final Briefs of Respondent in State v.

Eugene Turner, Jr. (2022-001287) and State v. Narkevious Manquese Reid (2022-001384). In addition to the above matters, the undersigned represented the State in post-conviction relief hearings held in Greenville County yesterday afternoon, in Jose Reyes v. State (2021-CP 39-02445) and Christian Scowcroft v. State (2020-CP-23-4164).


III.

The undersigned counsel submits this extension request is supported by extraordinary circumstances and is not intended for purposes of delay. Accordingly, to ensure that the Brief is properly researched and prepared, the undersigned would therefore request an extension of time within which to serve and file the Initial Brief of Respondent and Designation of Matter in the above captioned criminal appeal.

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,

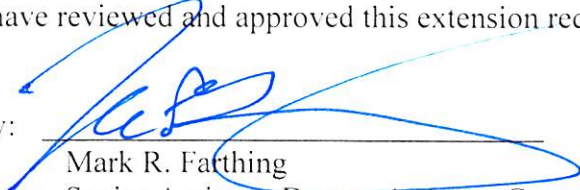
ALAN WILSON  
Attorney General

*for*   
JOSHUA A. EDWARDS  
Assistant Attorney General

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Post Office Box 11549  
Columbia, SC 29211  
(803) 734-3727

ATTORNEYS FOR RESPONDENT

I have reviewed and approved this extension request.

By:   
Mark R. Farthing  
Senior Assistant Deputy Attorney General

By: /s/ Donald J. Zelenka  
Donald J. Zelenka  
Deputy Attorney General

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**PROOF OF SERVICE**

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I, Anne Mueller, certify that I have served the Motion For A Fourth 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 May 2024.



Anne A. Mueller  
Legal Assistant for the Respondent

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