

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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

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THE STATE,

Respondent,

v.

RENO RODREIGUS BLAKELY,

Appellant.

Appellate Case No. 2023-000218

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**MOTION FOR FOURTH EXTENSION OF TIME TO FILE  
INITIAL BRIEF OF RESPONDENT AND  
DESIGNATION OF MATTER**

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The undersigned counsel would respectfully request a thirty (30) day extension up to and including July 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:

The undersigned attorney for the Respondent has had a number of state and federal matters to attend in the last month. Specifically,

1. Counsel prepared and filed the *Reply to Response to Motion for Summary Judgment*, on May 2, 2024, in the matter of Miguel Urena v. Shane Jackson, Warden Lee Correctional Institution, C/A No. 5:23-cv-05202-JD-KDW, a matter pending in the District Court;

2. Counsel is continuing to work on and prepare for an *Evidentiary Hearing* initially scheduled for the week of June 10, 2024, now scheduled for July 29, 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. Specifically, Counsel conducted a Deposition of Dr. Michael Vitacco in the above matter on May 10, 2024 @ 11:00 am, a matter pending in the Circuit Court;

3. Counsel prepared and litigated in Post Conviction Relief hearings on Tuesday, May 14, 2024, in Greenville, South Carolina for the following cases: (a) Sheldon A. Brown v. The State, Case 2022-CP-23-2311; (b) Daniel Perry v. The State, Case 2021-CP-23-3701; (c) Christopher Kennan v. The State, Case 2022-CP-23-568; (d) Adam Byrum v. The State, Case 2021-CP-23-4035; (e) Melvin Wingate v. The State, Case 2022-CP-23-1277; (f) Miranda Graham v. The State, Case 2022-CP-39-1061, matters pending in the Circuit Court;

4. Counsel prepared and litigated in a Post Conviction Relief hearing on Wednesday, May 15, 2024, in Greenville, South Carolina for the following case: Keldrekus Oglesby v. The State, case 2020-CP-23-542;

5. Counsel completed and filed the *Motion for Summary Judgment and Return and Memorandum of Law in Support of Motion Summary Judgment* on May 22, 2024, in the matter of K. C. Langford vs., Donnie Stonebreaker, Jr. Warden, Evans Correctional Institution, C/A No. 9:20-cv-1298-DCC-BM, a matter pending in the District Court.

6. Counsel is preparing for and will conduct a deposition with Dr. Kimberly Kruse on May 31, 2024 @ 11:00am in the Capital Post Conviction Relief Case of Bobby Wayne Stone, v. State of South Carolina, 2018-CP-43-01205.

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

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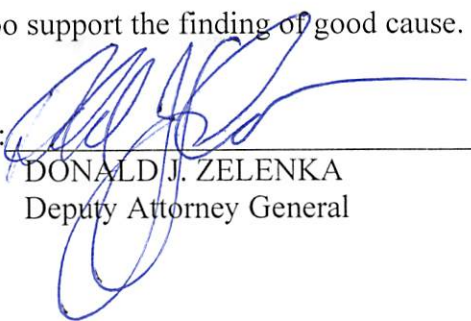
By: s/Tommy Evans, Jr.  
Tommy Evans, Jr.

[signature page continued page 4]

I support the finding of good cause.

By:   
MELODY J. BROWN  
Senior Assistant Deputy Attorney General

I too support the finding of good cause.

By:   
DONALD J. ZELENKA  
Deputy Attorney General

May 30, 2024.

RECEIVED

May 30 2024

SC Court of Appeals

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THE STATE,

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**PROOF OF SERVICE**

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I, Tommy Evans, Jr., hereby certify that as per the March 20, 2020 Order of the Chief Justice, the Respondent's fourth Motion for Extension and Proof of Service have been forwarded to Appellant's counsel, Lara M. Caudy, Esquire, via email today, May 30, 2024 to [LCaudy@sccid.sc.gov](mailto:LCaudy@sccid.sc.gov), and to her assistant, Sarah McInnis, to [SMcInnis@sccid.sc.gov](mailto:SMcInnis@sccid.sc.gov).

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

This the 30th day of May 2024.

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

## Brandy Rankin

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**From:** Brandy Rankin  
**Sent:** Thursday, May 30, 2024 11:05 AM  
**To:** Caudy, Lara  
**Cc:** smcinnis@sccid.sc.gov; Tommy Evans, Jr.  
**Subject:** Reno Rodreigus Blakley - Appellate Case 2023-000218 - Fourth Motion for Extension to file the Initial Brief & Designation of Matter & Proof of Service  
**Attachments:** Blakely.Reno - Fourth Motion for Extension to file Initial Brief Designation of Matter and Proof of Service, 5-30-24 (03591349xD2C78).pdf  
**Follow Up Flag:** Worldox

Dear Ms. Caudy,

Please find attached the Respondent's Fourth Motion for Extension to file the Initial Brief and Designation of Matter in the above captioned case. Also attaches is the Proof of Service. These documents will be filed with the South Carolina Court of Appeals today, Thursday, May 30, 2024 along with a copy of this email. Thank you.

Sincerely,  
*Brandy Rankin*

Brandy Rankin, Legal Assistant to Tommy Evans, Jr.  
Office of the Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29211  
803-734-6305



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