

RECEIVED

Jun 12 2024

SC Court of Appeals

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal From Richland County
The Honorable Walton J. McLeod, IV, Circuit Court Judge

Appellate Case No: 2022-001775

STATE OF SOUTH CAROLINA,

Respondent,

vs.

CLAYTON THOMAS JONES,

Appellant.

MOTION FOR FOURTH EXTENSION OF TIME

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 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 represented the State in two cases before the circuit court at the post-conviction relief term of court in Greenville County, appeared at oral argument before the Supreme Court in State v. Olandio R. Workman (2022-001263), filed the Final Brief of

Appellant and Amended Record on Appeal in State v. Juan Manuel Ramirez Sandoval (2023-000590), and filed the Initial Brief of Respondent and Designation of Matter in State v. Randy Lee Flower (2023-000126). I 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 matter.


III.

The undersigned counsel submits this extension request is supported by extraordinary circumstances and is not intended for purposes of delay. The undersigned counsel is currently working on the Brief in this case and intends to have it finished in a timely manner. However, the undersigned counsel has not yet been able to finish the Brief due to a heavy workload and other significant challenges that have resulted from substantial staffing issues that continue to be experienced by the undersigned counsel's office. Accordingly, in order to ensure the Brief is properly researched and prepared, I would therefore request an additional extension of time within which to serve and file the Brief.

WHEREFORE, Respondent prays that the Court extend the deadline for the service and filing of the Brief of Respondent in this case for thirty 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 WILSON
Attorney General



JOSHUA A. EDWARDS
Assistant Attorney General

Office of the Attorney General

Post Office Box 11549
Columbia, South Carolina 29211
(803) 734-3727
ATTORNEYS FOR RESPONDENT

I have reviewed and approved this extension request.

By: 

Mark R. Farthing
Senior Assistant Deputy Attorney General

/s/ Donald J. Zelenka

Donald J. Zelenka
Deputy Attorney General

June 12, 2024

RECEIVED

Jun 12 2024

SC Court of Appeals

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal From Richland County
The Honorable Walton J. McLeod, IV, Circuit Court Judge

Appellate Case No: 2022-001775

STATE OF SOUTH CAROLINA,

Respondent,

vs.

CLAYTON THOMAS JONES,

Appellant.

PROOF OF SERVICE

I, Caroline Collins, certify that I have served the Motion for Fourth Extension of Time on Lara M. Caudy, Esquire, counsel of record for the Appellant, by sending one copy by electronic mail to the address listed for counsel in AIS.

I further certify that all parties required by Rule to be served have been served this 12th day of June, 2024.



Caroline Collins
Administrative Support Manager

Office of Attorney General
Post Office Box 11549
Columbia, South Carolina 29211
(803) 734-3727