

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Dorchester County

Heath P. Taylor, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

JASON BARRY BELL,

APPELLANT

APPELLATE CASE NO. 2023-001326

MOTION FOR AN EXTENSION OF TIME TO  
SERVE AND FILE THE INITIAL BRIEF OF APPELLANT  
AND DESIGNATION OF MATTER

Counsel for Jason Barry Bell respectfully requests a **fourth and final thirty (30) day extension from June 24, 2024, until July 24, 2024**, in which to serve and file the Initial Brief of Appellant and Designation of Matter in the above-referenced case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. This is a fourth request for an extension. In support of this request, counsel shows:

1. The Initial Brief of Appellant and Designation of Matter in this case are due to be served and filed with the Court today.

2. Counsel for Jason Barry Bell respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the

number of extensions previously granted and the order in which counsel attempts to manage his caseload, counsel hopes that no further extension requests will be required.

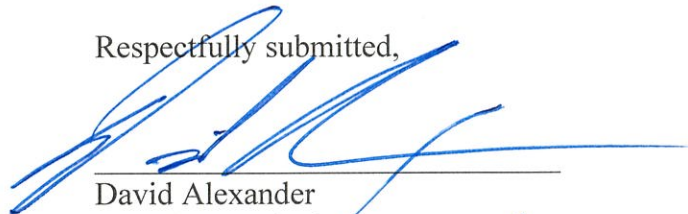
3. Counsel filed the Brief of Appellant in the case of The State v. Alonzo Marable with this Court on June 21, 2024. Counsel filed the Brief of Appellant in the case of The State v. Tommy Long with this Court on June 3, 2024. Counsel presented oral argument in the case of The State v. Ricky Bernard Brown before this Court on June 3, 2024. Counsel filed the Brief of Appellant in the case of The State v. Carlos A. Cesmas-Gomez with this Court on May 29, 2024. Counsel presented oral argument in the case of In the Matter of Ronald Gregg in the Supreme Court on May 22, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Adam D. Lawless in this Court on April 26, 2024. Counsel filed the Return to Petition for Writ of Certiorari in the case of Tyreek Hayes v. The State with the Supreme Court on April 17, 2024. Counsel filed the Brief of Appellant in the case of In the Matter of Christopher T. Wilder with this Court on April 3, 2024. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Daryl L. Sutton v. The State with the Supreme Court on April 1, 2024. Counsel filed the Brief of Appellant in the case of The State v. Thomas S. McFadden with this Court on March 14, 2024. Counsel filed the Brief of Petitioner in the case of The State v. Rashawn Vertez Carter with the Supreme Court on February 20, 2024.

4. Counsel makes this request in good faith and not for purpose of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

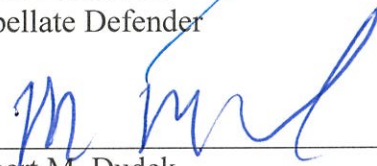
5. On May 30, 2024, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through June 30, 2024.

WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension from June 24, 2024, until July 24, 2024**, in which to serve and file the Initial Brief of Appellant and Designation of Matter in this case based upon the above exigent circumstances.

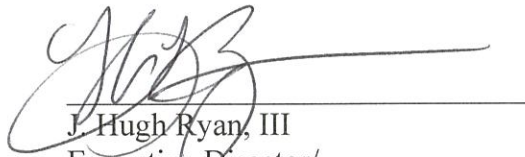
Respectfully submitted,



David Alexander  
Appellate Defender



Robert M. Dudek  
Chief Appellate Defender



J. Hugh Ryan, III  
Executive Director/  
Hervey B. O. Young  
Deputy Director and General Counsel/  
W. Lawrence Brown

Deputy General Counsel and Training Director

This 24th day of June, 2024.

RECEIVED

Jun 24 2024

SC Court of Appeals

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Dorchester County

Honorable Heath P. Taylor, Circuit Court Judge

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THE STATE,

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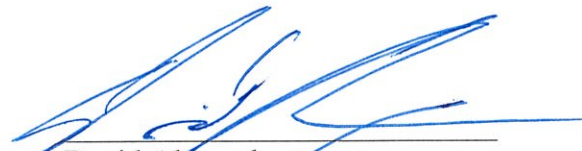
APPELLATE CASE NO. 2023-001326

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CERTIFICATE OF SERVICE

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Pursuant to Rule 262(a)(3) and Rule 262(c)(3), SCACR, the undersigned hereby certifies a true copy of the Motion for Extension in the above-referenced case has been served upon Melody J. Brown, Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), this 24th day of June, 2024.



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David Alexander  
Appellate Defender

ATTORNEY FOR APPELLANT

**From:** [Warren, Kaylynn](#)  
**To:** [SC - BROWN MELODY](#)  
**Cc:** [Alexander, David](#); [Angela Brown](#)  
**Subject:** 2023-001326 The State v. Jason Barry Bell  
**Date:** Monday, June 24, 2024 12:07:00 PM  
**Attachments:** [2023-001326 The State v. Jason Barry Bell Fourth Motion for Extension.pdf](#)

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Good Afternoon,

Attached for service in the above-referenced case is the Fourth Motion for Extension which will be filed today, June 24, 2024, with the Court of Appeals via email filing.

Respectfully,

Kaylynn

**Kaylynn Warren**

Administrative Assistant

South Carolina Commission on Indigent Defense

Division of Appellate Defense

(803) 734-1330