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Jul 29 2024

SC Court of Appeals

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from York County

William A. McKinnon, Circuit Court Judge

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THE STATE,

RESPONDENT,

V.

STACY MICHELLE RABON,

APPELLANT

APPELLATE CASE NO. 2023-001374

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

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Counsel for Stacy Michelle Rabon respectfully requests a thirty (30) day extension from July 29, 2024, until August 28, 2024, in which to serve and file the Initial Brief of Appellant and Designation of Matter in this case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. This is a third 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 today.
2. Counsel filed the Petition for Rehearing in the case of In the Matter of James G. Younger with the Court of Appeals on July 18, 2024. Counsel filed the Brief of Appellant in the

case of The State v. Xavier Polite with the Court of Appeals on July 17, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Phillip Lawson with the Court of Appeals on July 3, 2024. Counsel was a speaker at the Case Law Update CLE on June 21, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Alonza Marable with the Court of Appeals on June 21, 2024. Counsel filed the Brief of Appellant in the case of The State v. Tommy Long with the Court of Appeals on June 3, 2024. Counsel presented oral argument in the case of The State v. Ricky Bernard Brown before the Court of Appeals on June 3, 2024.

3. This request is made in good faith, and not for purposes 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.

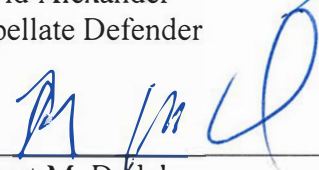
4. On June 26, 2024, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through July 31, 2024.

WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension from July 29, 2024, until August 28, 2024. Counsel respectfully requests that the time limits for filing the Initial Brief of Appellant and Designation of Matter be held in abeyance pending a ruling on this motion.

Respectfully submitted,



David Alexander  
Appellate Defender



Robert M. Dudek  
Chief Appellate Defender

This 29th day of July, 2024.

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THE STATE,

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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 Mark Farthing, Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), this 29th day of July, 2024.

  
David Alexander  
Appellate Defender

ATTORNEY FOR APPELLANT

**From:** [Pollard, Shelby](#)  
**To:** [Mark Farthing](#); [Caroline Collins](#)  
**Cc:** [Alexander, David](#)  
**Subject:** Third Motion for Extension - The State v. Stacy Michelle Rabon - 2023-001374  
**Date:** Monday, July 29, 2024 11:31:00 AM  
**Attachments:** [Third Motion for Extension - The State v. Stacy Michelle Rabon - 2023-001374.pdf](#)

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Good Morning,

Attached for service in the above-referenced case is the Third Motion for Extension in which to serve and file the initial brief of appellant and designation of matter. This extension will be filed today, July 29, 2024, with the Court of Appeals via email filing.

Thank you,  
Shelby

**Shelby Pollard**

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