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Aug 28 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 **fourth and final thirty (30) day extension from August 28, 2024, until September 27, 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 Stacy Michelle Rabon 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.

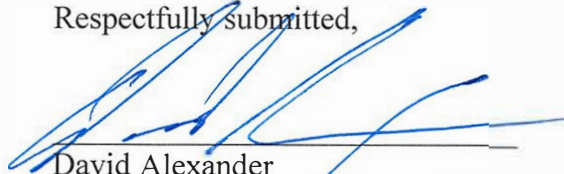
3. Counsel is filing the Brief of Appellant in the case of The State v. Dameun J. Sanders with this Court today, August 28, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Jason Bell with this Court on August 12, 2024. Counsel filed the Brief of Respondent in the case of The State v. Jason Black with this Court on July 31, 2024. Counsel filed the Petition for Rehearing in the case of In the Matter of James G. Younger with this Court on July 18, 2024. Counsel filed the Brief of Appellant in the case of The State v. Xavier Polite with this Court 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 this Court 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 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.

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.

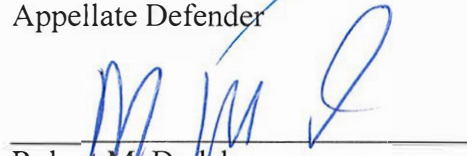
5. On July 29, 2024, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through August 31, 2024.

WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension from August 28, 2024, until September 27, 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.

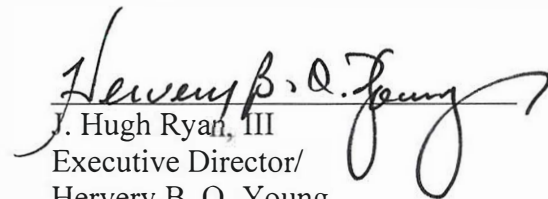
Respectfully submitted,



David Alexander  
Appellate Defender



Robert M. Dudek  
Chief Appellate Defender



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

This 28th day of August, 2024.

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APPELLATE CASE NO. 2023-001374

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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 28th day of August, 2024.



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David Alexander  
Appellate Defender

ATTORNEY FOR APPELLANT

**From:** [Pollard, Shelby](#)  
**To:** [Mark Farthing](#); [Caroline Collins](#)  
**Cc:** [Alexander, David](#)  
**Subject:** 2023-001374 The State v. Stacy Michelle Rabon - Fourth Motion for Extension  
**Date:** Wednesday, August 28, 2024 9:07:00 AM  
**Attachments:** [2023-001374 The State v. Stacy M. Rabon - Fourth Motion for Extension.pdf](#)

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Good Morning,

Attached for service in the above-referenced case is the Fourth Motion for Extension in which to serve and file the initial brief of appellant and designation of matter. This extension will be filed today, August 28, 2024, with the Court of Appeals via email filing.

Thank you,  
Shelby

**Shelby Pollard**

Administrative Assistant  
South Carolina Commission on Indigent Defense  
Appellate Division  
1330 Lady Street, Suite 401  
PO Box 11589  
Columbia, SC 29201-1589  
(803) 734-1330 – Telephone  
(803) 734-1397 - Fax