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SC Court of Appeals

STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Greenville County
The Honorable Alex Kinlaw, Jr., Circuit Court Judge

THE STATE,

Respondent,

BRAYLON LAMAR MORRIS,

Appellant.

v.

Appellate Case No. 2023-000608

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

Respondent, the State, moves this Court for an additional thirty (30) day extension of time in which to file the Initial Brief of Respondent and Designation of Matter, which is currently due to be filed September 6, 2024. Opposing counsel has graciously consented to all extension requests through September 30, 2024. In support of this motion, counsel would respectfully show the Court the following:

1. Counsel completed and filed the *Final Brief* and *Certificate of Compliance* on August 2, 2024, in the matter of The State v. Eric Anton Graham, Appellate Case No. 2023-000160, a murder appeal pending in this Court;

2. Counsel completed and filed on August 6, 2024, the *Reply to Petitioner's Objections to Report and Recommendation* in the matter of Derell Green v. Shane Jackson,

Warden, Lee Correctional Institution, C/A No. 9:23-cv-1945-BHH-MHC, a matter pending in the District Court;

3. Counsel completed and m filed the *Final Brief and Certificate of Compliance*, on August 14, 2024, in the matter of The State v. Reno Rodreigus Blakely, Appellate Case No. 2023-000218, a matter pending in this Court;

4. Counsel filed on August 14, 2024, the *Objections to the Magistrate Court Report and Recommendation* in the matter of K. C. Langford v. Donnie Stonebreaker, Jr. Warden Evans Correctional Institution, C/A No. 9:20-cv-01298-DCC-MHC, a matter pending in the District Court;

5. Counsel filed on August 14, 2024 the *Initial Brief of Respondent and Designation of Matter* in the matter of State of South Carolina v. TyChristian Ladson, Appellate Case No. 2023-000372, a matter pending in this Court;

6. Counsel completed and filed on August 23, 2024 the *Return and Memorandum in Support of Summary Judgment* in the matter of Earnest Maurice Allen v. Warden Jackson, C/A No. 4:24-cv-2899-BHH-TER, a matter pending in the District Court;

7. Counsel is working on the *Return and Memorandum in Support of Summary Judgment* in the matter of Gary A. White Jr. v. Director Bryan Stirling, C/A No. 0:24-cv-2595-DCN-SVH due Monday, September 9, 2024, and on a second extension, a matter pending in the District Court;

8. Counsel has been involved in working on other matters in state and federal court.

This is the fourth request for an extension in which to file the Initial Brief and Designation of Matter. This request is not made for the purposes of delay but in because of the foregoing.

WHEREFORE, undersigned counsel for Respondent respectfully requests an additional extension of thirty (30) days to complete the Initial Brief of Respondent and Designation of Matter.

Respectfully submitted,

ALAN WILSON
Attorney General

DONALD J. ZELENKA
Deputy Attorney General

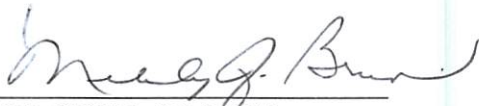
MELODY J. BROWN
Senior Assistant Deputy Attorney General

TOMMY EVANS, JR.
Assistant Attorney General

By: Tommy Evans, Jr.
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ATTORNEY FOR RESPONDENT

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


CDAG
9/3/2024

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PROOF OF SERVICE

I, Tommy Evans, Jr., hereby certify that as per the March 20, 2020 Order of the Chief Justice, the Fourth Extension to file the Initial Brief of Respondent, Designation of Matter, and Proof of Service has been forwarded to Appellant's counsel, Joanna Delany, via email today, September 3, 2024 to JDelany@sccid.sc.gov, and to her assistant, Kaylynn Warren to KWarren@sccid.sc.gov.

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

This is the 3rd day of September 2024

s/Tommy Evans, Jr.

Tommy Evans, Jr.

S.C. Bar No. 12990

Post Office Box 11549

Columbia, South Carolina 29211

ATTORNEY FOR RESPONDENT