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Sep 26 2024

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Horry County
The Honorable Benjamin H. Culbertson, Circuit Court Judge

THE STATE,

RESPONDENT,

v.

CHE LEON RANSOM, JR.,

APPELLANT.

Appellate Case No. 2023-001348

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

The undersigned counsel would respectfully request a SECOND thirty (30) day extension in which to file the Initial Brief of Respondent and Designation of Matter in the above-referenced case. Counsel for Appellant has graciously consented to extension requests through September 30, 2024. In support of this motion, counsel would respectfully show the Court the following circumstances:

Respondent's Initial Brief and Designation of Matter is due to be filed today, Thursday, September 26, 2024. The undersigned attorney has had a number of state, and federal matters to attend to since August 27, 2024, specifically:

1. Counsel filed the Initial Brief of Respondent in the Florence County murder appeal matter of The State vs. Quinterris Javon Carmichael, Appellate Case No. 2023-000162 in this court on August 28, 2024;

2. Counsel filed the Respondent's Objections to ECF#s 65, 67 & 68, and in the Alternative, Respondent's Motion to Consolidate Existing Objections and Prohibit Further Objections in the matter of Earnest Vaughn v. Warden Turbeville Correctional Institution, C/A No. 6:23-04220-BHH on August 29, 2024;

3. Counsel also filed the Respondent's Response in Opposition to Petitioner's Motion to Amend and Objections to Petitioner's Repeated Motion to Clarify and Retain Jurisdiction [ECF #s 44, 45 & 46] in the matter of Mickey Markell Johnson vs. Warden, Broad River Correctional Institution, C/A No. 0:24-1623-TMC-PJG, also on August 29, 2024;

4. Counsel filed an Amended Reply to Objections to Report and Recommendation [ECF Nos. 53, 56, 67 and 68] in the matter of Earnest Vaughn v. Warden Turbeville Correctional Institution, C/A No. 6:23-04220-BHH on September 9, 2024;

5. Counsel filed the Return and Memorandum of Law in Support of Motion for Summary Judgment in the matter of Adrian Jenkins vs. Warden Lavern, C/A No. 0:24-2636-DCN-PJG on September 11, 2024;

6. Counsel is also preparing the Initial Brief of Respondent in the matter of The State vs. Randy D. Grainger, 2023-000598, an Horry County direct appeal matter now pending in this court;

7. Counsel has begun working on the Initial Brief of Respondent in the matter of The State vs. Antonie Blakely, Appellate Case No. 2023-000721, a Laurens County murder appeal matter now pending in this court; and

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

WHEREFORE, for the following circumstances, counsel respectfully requests a SECOND thirty (30) day extension of time to serve and file the Initial Brief of Respondent and Designation of Matter. This request is made in good faith, and not for the purposes of delay. This extension will make Respondent's Initial Brief due on October 28, 2024.

Respectfully Submitted,

ALAN WILSON
Attorney General

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By: *s/W. Joseph Maye*
W. JOSEPH MAYE
ATTORNEYS FOR RESPONDENT

September 26, 2024.

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PROOF OF SERVICE

I, **Donna D'Alessio**, an employee of the Respondent and legal assistant to W. Joseph Maye, of counsel for the Respondent, hereby certify that as per the March 20, 2020 Order of the Chief Justice, the Second Extension of Time to File Initial Brief of Respondent and Designation of Matter has been forwarded to Appellant's counsel, Lara Caudy, Esq., via email today, September 26, 2024 to lcaudy@sccid.sc.gov and to her assistant at smcinnis@sccid.sc.gov.

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

This 26th day of September, 2024.

s/ Donna D'Alessio

Donna D'Alessio, Legal Assistant to
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