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Oct 21 2024

SC Court of Appeals

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from York County

Daniel D. Hall, Circuit Court Judge

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THE STATE,

RESPONDENT,

V.

FELICIA DANIELLE TURNAGE,

APPELLANT.

APPELLATE CASE NO. 2024-000225

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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 Felicia Danielle Turnage respectfully requests a thirty (30) day extension from October 21, 2024 until November 20, 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 was in attendance at the annual South Carolina Public Defender

Conference from October 14-16, 2024. Counsel filed the Brief of Appellant and Record on Appeal in the case of The State v. Kweisi Nicks with this Court on October 4, 2024. Counsel appeared for Oral Argument in the case of The State v. Bradley Corlew before this Court on September 24, 2024. Counsel filed the Brief of Appellant and the Record on Appeal in the case of The State v. Kadidas R. Gossett with this Court on September 17, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Tony T. Sweet with this Court on September 11, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Rodney Nesmith with this Court on September 4, 2024. Counsel appeared on behalf of appellant at the Reconstruction Hearing in the case of The State v. Michael D. Williams on September 2, 2024. Counsel filed the Return to the Petition for Rehearing in the case of In the Matter of the Care and Treatment of James L. Williford with this Court on August 23, 2024. Counsel filed the Petition for Writ of Certiorari and the Appendix in the case of Maurice Anthony Odom v. State with the Supreme Court on August 22, 2024. Counsel filed the Petition for Writ of Certiorari and the Appendix in the case of William Craig Caughman v. State with the Supreme Court on August 16, 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.

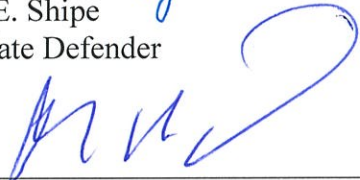
4. On September 29, 2024, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by

Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through October 31, 2024.

WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension from October 21, 2024 until November 20, 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,

  
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Sarah E. Shipe  
Appellate Defender

  
\_\_\_\_\_  
Robert M. Dudek  
Chief Appellate Defender

This 21st day of October, 2024.

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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 Matthew C. Buchanan, Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), this 21st day of October, 2024.

  
\_\_\_\_\_  
Sarah E. Shipe  
Appellate Defender

ATTORNEY FOR APPELLANT

**From:** [Warren, Kaylynn](#)  
**To:** [SC - BUCHANAN MATTHEW](#)  
**Cc:** [Shipe, Sarah](#); [SC - NICHOLS DAWN](#)  
**Subject:** 2024-000225 The State v. Felicia Danielle Turnage  
**Date:** Monday, October 21, 2024 10:53:00 AM  
**Attachments:** [2024-000225 The State v. Felicia Danielle Turnage Third Motion for Extension.pdf](#)

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Good Morning,

Attached for service in the above-referenced case is the Third Motion for Extension which will be filed today, October 21, 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