

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

---

On Writ of Certiorari to Richland County  
Honorable Grace Gilchrist Knie, Circuit Court Judge  
Appellate Case No. 2022-000652

---

MAURICE ROBERTS,

Petitioner,

vs.

STATE OF SOUTH CAROLINA,

Respondent.

---

**MOTION FOR FOURTH EXTENSION OF TIME WITHIN WHICH  
TO SERVE AND FILE BRIEF OF RESPONDENT**

---

Respondent (“the State”), through its undersigned counsel, would respectfully show unto the Court as follows:

**I.**

The Brief of Respondent is currently due to be served and filed on November 12, 2024.

**II.**

Pursuant to RE: Extension Requests in Criminal Direct Appeals and Post-Conviction Relief Certiorari Proceedings: Order of the South Carolina Supreme Court dated March 18, 2009, the State moves for a **fourth** extension in the above-referenced post-conviction relief appeal and asks for an additional thirty days to complete the brief in this case.

**III.**

The undersigned counsel submits this extension request is supported by extraordinary circumstances and is not intended for purposes of delay. The undersigned counsel has not yet

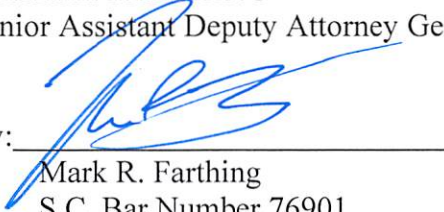
been able to finish the Brief due to a heavy workload and some unanticipated matters that have required the undersigned counsel's attention. Accordingly, in order to ensure the Brief is properly researched and prepared, I would therefore request an additional extension of time within which to serve and file the Brief. Last week, the undersigned counsel filed an Initial Brief of Respondent and Designation of Matter in the Court of Appeals in State v. Ricky Leroy Singer, Jr. Additionally, in the past few weeks, the undersigned counsel has participated in the oral argument before the Supreme Court in In the Matter of Lauren Martel; filed a Brief of Respondent in the Court of Appeals in Maurio Rivers v. State; filed a Return to Petition for Writ of Certiorari in the Supreme Court in Michael Orlando Brown v. State; and filed the Final Brief of Respondent in the Court of Appeals in State v. Scotty Joe Fowler. Along with that, the undersigned counsel has attended to other responsibilities—including supervisory and administrative ones—in the office, was away from the office attending the 2024 South Carolina Solicitors' Conference for multiple days, and prepared for and presented at: (1) a training program for statewide law enforcement officers on search and seizure issues at the request of the South Carolina Commission on Prosecution Coordination; (2) a continuing legal education seminar for younger prosecutors on preserving and protecting the record at the request of the South Carolina Commission on Prosecution Coordination; (3) a continuing legal education seminar for DUI prosecutors and others at the 2024 South Carolina Solicitors' Conference; and (4) a continuing legal education seminar on recent significant appellate decisions at the 2024 South Carolina Solicitors' Conference.

**WHEREFORE**, Respondent prays that the Court extend the deadline for the service and filing of the Brief of Respondent in this case for thirty days from the date such relief is granted; hold the matter in abeyance pending a ruling on Respondent's motion; and grant such other and further relief as the Court may deem just and proper.

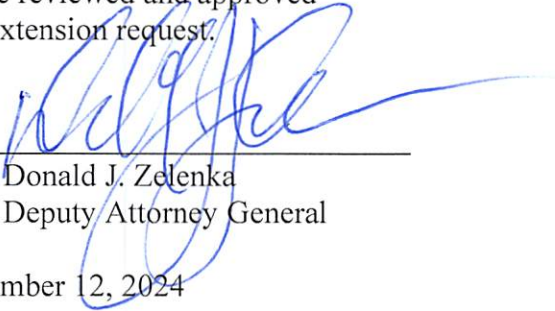
Respectfully submitted,

ALAN WILSON  
Attorney General

MARK R. FARTHING  
Senior Assistant Deputy Attorney General

By:   
Mark R. Farthing  
S.C. Bar Number 76901

I have reviewed and approved  
this extension request.

By:   
Donald J. Zelenka  
Deputy Attorney General

November 12, 2024

RECEIVED

Nov 12 2024

SC Court of Appeals

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

---

On Writ of Certiorari to Richland County  
Honorable Grace Gilchrist Knie, Circuit Court Judge  
Appellate Case No. 2022-000652

---

MAURICE ROBERTS,

Petitioner,

vs.

STATE OF SOUTH CAROLINA,

Respondent.

---

**PROOF OF SERVICE**

---

I, Caroline Collins, certify I have served the within Motion for the Fourth Extension of Time Within Which to Serve and File Brief of Respondent on Petitioner by sending an electronic copy via email to the addresses listed in AIS for the following individual:

Joanna K. Delany, Esquire  
S.C. Commission on Indigent Defense  
Office of Appellate Defense  
PO Box 11589  
Columbia, SC 29211

I further certify all parties required by Rule to be served have been served.  
This 12<sup>th</sup> day of November, 2024.



---

CAROLINE COLLINS  
Administrative Support Manager  
Office of the Attorney General