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Nov 13 2024

SC Court of Appeals

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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Appeal from Charleston County  
The Honorable Deadra L. Jefferson, Circuit Court Judge

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THE STATE,

Respondent,

v.

ALONZA DONTAE MARABLE, JR.,

Appellant.

Appellate Case No. 2023-000988

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

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Undersigned counsel would respectfully request a thirty (30) day extension in which to serve and file the Initial Brief of Respondent and Designation of Matter in the above-referenced case. Opposing counsel has graciously consented to all extension requests through November 30, 2024. In support of this motion, counsel would respectfully show the Court the following:

Respondent's Initial Brief and Designation of matter is due today, November 13, 2024, according to this Court's Order dated October 15, 2024. The undersigned counsel for Respondent, however, has had a number of state and federal matters to attend since October 2024. Counsel submits this extension request is supported by good cause and is not intended for purposes of simple delay for the following reasons:

Counsel is presently unable to complete work on this particular brief due to other obligations over the past thirty days, most notably in capital cases: prepared for a status conference, and subsequently drafted and submitted a memorandum of law for submission to the court in a

capital PCR action (*Jerry Buck Inman, October 17 and 21, 2024*); prepared for and presented argument in a motion hearing in a new trial motion in the Greenville County Courthouse (*Charles Wakefield, October 18, 2024*); prepared and filed a brief in opposition to a petition for writ of certiorari in the Supreme Court of the United States (*Richard Bernard Moore, October 22, 2024*); prepared and filed a status report in a non-capital federal habeas corpus case stayed for exhaustion of state court remedies (*Henry Dukes, October 25, 2024*); traveled to Richmond, Virginia, for argument in the Fourth Circuit Court of Appeals in a capital case on appeal from denial of federal habeas corpus relief (*Stephen Corey Bryant, October 27-29, 2024*); prepared and filed in the Supreme Court of the United States a response opposing an application for stay of execution (*Richard Bernard Moore, October 29, 2024*); aided in the drafting of a proposed order of dismissal in a non-capital PCR action and shared a copy of same with opposing counsel (*Clyde Davis, October 31, 2024*); completed final notices and matters in regard to the Moore execution (*Richard Bernard Moore, November 1, 2024*); and, completed with co-counsel, a post-hearing brief in a capital PCR case (*Ricky Blackwell, November 5, 2024*). Due to counsel's involvement in the above listed matters, and other matters pending in state and federal court not so listed, and also considering counsel's administrative responsibilities as supervisor for murder appeals, federal habeas corpus actions, capital litigation, and Thirteenth Circuit PCR actions and appeals, counsel has been unable to timely review the matter for completion of the Initial Brief of Respondent and Designation of Matter. Counsel has, however, associated an attorney to work on the research and drafting in this matter. The undersigned will monitor the progress, as well.

WHEREFORE, counsel respectfully requests a 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.

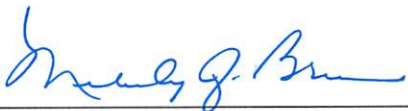
Respectfully Submitted,

ALAN WILSON  
Attorney General

DONALD J. ZELENKA  
Deputy Attorney General

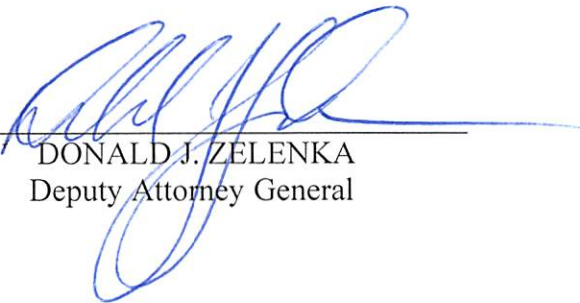
MELODY J. BROWN  
Senior Assistant Deputy Attorney General

Post Office Box 11549  
Columbia, South Carolina 29211  
(803) 734-6305

By:   
\_\_\_\_\_  
MELODY J. BROWN  
S.C. Bar No: 14244  
ATTORNEYS FOR RESPONDENT

November 13, 2024

I support the finding of good cause.

By:   
\_\_\_\_\_  
DONALD J. ZELENKA  
Deputy Attorney General

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**PROOF OF SERVICE**

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I as an employee of the Respondent, hereby certify that as per the March 20, 2020 Order of the Chief Justice, the Motion for Extension Time, and Proof of Service has been forwarded to Appellant's counsel, David Alexander, Esquire, via email today, November 13, 2024 to [DAlexander@sccid.sc.gov](mailto:DAlexander@sccid.sc.gov) and to his assistant, Chris Stock, at [CStock@sccid.sc.gov](mailto:CStock@sccid.sc.gov).

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

This is the 13<sup>th</sup> day of November 2024.

*s/ Brandy Rankin*

Legal Assistant to Melody J. Brown  
Senior Assistant Deputy Attorney General

## Brandy Rankin

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**From:** Brandy Rankin  
**Sent:** Wednesday, November 13, 2024 9:21 AM  
**To:** Alexander, David  
**Cc:** Stock, Chris; Melody Brown  
**Subject:** Fourth Extension to File Initial Brief & Designation of Matter - The State v. Alonza Dontae Marable, Jr.  
**Attachments:** Fourth Extension (executed) to File Initial Brief & Designation of Matter - 11-12-24.pdf

Dear Mr. Alexander,

Please find attached the Respondent's Fourth Extension to file the Initial Brief & Designation Matter. These documents will be filed with the South Carolina Court of Appeals today, November 13, 2024, along with a copy of this email. Thank you!

Sincerely,

*Brandy Rankin*

Brandy Rankin, Legal Assistant  
Office of the Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29211  
803-734-6305



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