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Dec 04 2024

SC Court of Appeals

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Horry County

Honorable Benjamin H. Culbertson, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

SAMANTHA FORD RABON,

APPELLANT.

APPELLATE CASE NO. 2024-000330

MOTION FOR AN EXTENSION OF TIME TO
SERVE AND FILE THE INITIAL BRIEF OF APPELLANT
AND DESIGNATION OF MATTER

Counsel for appellant respectfully requests a **fourth and final fifteen (15) day extension from December 4, 2024, until December 19, 2024**, in which to serve and file the Initial Brief of Appellant and Designation of Matter in the above-referenced case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. This is a fourth 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 with the Court today.
2. Counsel for appellant respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions

previously granted and the order in which counsel attempts to manage his caseload, counsel hopes that no further extension requests will be required.

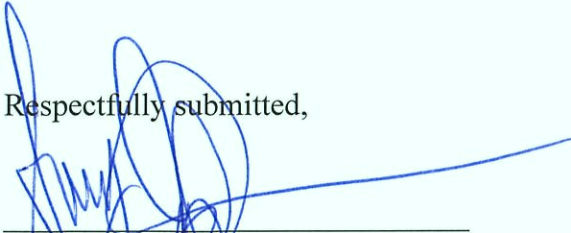
3. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Damon Riley v. The State with the Supreme Court on December 3, 2024. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Jakobe German v. The State with the Supreme Court on November 25, 2024. Counsel filed the Johnson Petition for Writ of Certiorari and Appendix in the case of Joseph S. Wadford v. The State with the Supreme Court on November 14, 2024. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Mimi Joe Marshall v. The State with the Supreme Court on November 12, 2024. Counsel attended the annual South Carolina Public Defender Conference in Myrtle Beach, South Carolina from October 14-16, 2024. Counsel filed the Johnson Petition for Writ of Certiorari and Appendix in the case of Horace Elijah Watts v. The State with the Supreme Court on October 15, 2024. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of John A. James v. The State with the Supreme Court on October 4, 2024. Counsel filed the Johnson Petition for Writ of Certiorari and Appendix in the case of David R. Brown v. The State with the Supreme Court on September 25, 2024.

4. On November 27, 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 December 31, 2024.

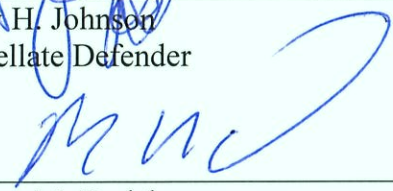
WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension from December 4, 2024, until December 19, 2024**, in which to serve

and file the Initial Brief of Appellant and Designation of Matter in this case based upon the above exigent circumstances.

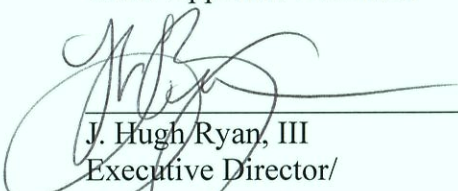
Respectfully submitted,



Gary H. Johnson
Appellate Defender



Robert M. Dudek
Chief Appellate Defender



J. Hugh Ryan, III
Executive Director/
Hervey B. O. Young
Deputy Director and General Counsel/
W. Lawrence Brown
Deputy General Counsel and Training Director

This 4th day of December, 2024.

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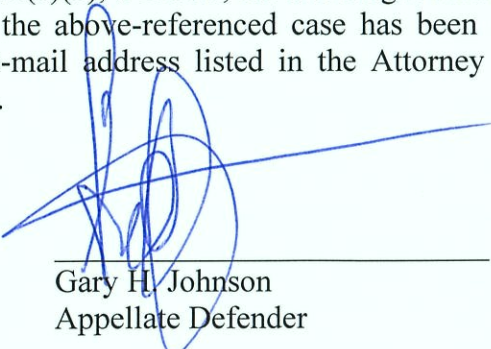
SAMANTHA FORD RABON

APPELLANT.

APPELLATE CASE NO. 2024-000330

CERTIFICATE OF SERVICE

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 Melody J. Brown, Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), this 4th day of December, 2024.



Gary H. Johnson
Appellate Defender

ATTORNEY FOR APPELLANT