

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

\_\_\_\_\_  
Appeal from Orangeburg County  
Edgar W. Dickson, Circuit Court Judge  
\_\_\_\_\_

**RECEIVED**  
SEP 23 2013  
**SC Court of Appeals**

THE STATE,

RESPONDENT,

v.

JULIAN C. YOUNG,

APPELLANT,

Appellate Case No.: 2012-213006.

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

Respondent, the State, moves this Court for an additional thirty (30) day extension of time in which to file the Initial Brief of Respondent and Designation of Matter. This is Respondent's second request for an extension of time in which to file the brief. In support of the request, undersigned counsel would respectfully show the Court:

1. The transcript in the instant matter was requested July 25, 2013. Counsel received the transcript today, September 23, 2013, and will need the time requested to adequately review prior to filing the initial brief.

2. Undersigned counsel for Respondent was recently appointed Assistant Attorney General with a start date of August 19, 2013. Counsel has reviewed and prepared for filing today,

in this Court, an Initial Brief of Respondent in the non-capital murder direct appeal matter of Ralph B. Hayes. Counsel has also reviewed and prepared a draft in another non-capital murder direct appeal in the matter of Brenda Bratschi but is still waiting on a hearing transcript in that matter.

3. Due to these circumstances, undersigned counsel for Respondent has not been able, in a timely fashion, to complete the initial brief in this appeal. This is the second request for an extension in this matter. Counsel has received consent for this motion from Counsel Tara D. Shurling.

THEREFORE, undersigned counsel for Respondent respectfully requests an additional extension of thirty (30) days to complete the Initial Brief of Respondent and Designation of Matter.

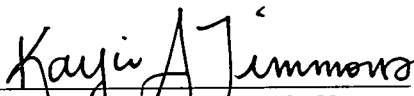
Respectfully submitted,

ALAN WILSON  
Attorney General

JOHN W. McINTOSH  
Chief Deputy Attorney General

DONALD J. ZELENKA  
Senior Assistant Deputy Attorney General

KAYCIE S. TIMMONS  
Assistant Attorney General

BY:   
KAYCIE S. TIMMONS  
S.C. Bar No. 100237

Office of the Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29211  
(803) 734-0265

September 23, 2013.  
Columbia, South Carolina.

ATTORNEYS FOR RESPONDENT

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Orangeburg County

Edgar W. Dickson, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

JULIAN C. YOUNG,

APPELLANT,

Appellate Case No.: 2012-213006.

**PROOF OF SERVICE**

I, Kaycie S. Timmons, certify that I have served Respondent's Motion for a Second Extension of Time on counsel for Appellant, by depositing one copy of same in the United States mail, postage prepaid, to counsel for appellant, addressed as follows:

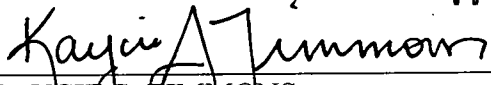
Tara Dawn Shurling  
Attorney and Counselor at Law  
3614 Landmark Drive, Suite A  
Columbia, S.C. 29204

RECEIVED

SEP 25 2013

SC Court of Appeals

This 23<sup>rd</sup> day of September, 2013.

  
KAYCIE S. TIMMONS  
S.C. Bar No. 100237  
Office of Attorney General  
Post Office Box 11549  
Columbia, SC 29211  
(803) 734-0265

ATTORNEY FOR RESPONDENT