

IN THE STATE OF SOUTH CAROLINA

In the Supreme Court

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APPEAL FROM CHARLESTON COUNTY

Court of Common Pleas

The Honorable R. Kirk Griffin, Circuit Court Judge

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Case No. 2024-000687

Michael T. Barnes,

Petitioner,

vs.

The State of South Carolina,

Respondent.

**MOTION FOR EXTENSION TO FILE REPLY BRIEF**

Counsel has a reply brief due in this matter on January 6, 2025. Counsel respectfully requests a two-week extension to file the reply due to other caseload commitments including an oral argument in this Court on January 15, 2024, *In re McSwain*, 2023-001388. Counsel has federal sentencing hearings on January 2, 2025, *USA v. James Griffin, Jr.* Case No. 3:23-cr-00554, and January 14, 2025, *USA v. Joseph Brian Wadsworth*, 3:23-cr-924, and a likely plea hearing in federal court on January 9, 2025, *USA v. Dante Hubbard*, 2:23-cr-01035. Counsel respectfully asks for a due date of **January 20, 2025**. This will be counsel's last request for an extension.

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**Jan 02 2025**

S.C. SUPREME COURT

Respectfully submitted,

/s/ Elizabeth Franklin-Best  
Elizabeth Franklin-Best  
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*Counsel for Petitioner*

January 2, 2025

**CERTIFICATE OF SERVICE**

Counsel hereby certifies she has served a copy of this motion on Andrew Powell of the Attorney General's Office on this date, January 2, 2025, at [andrewpowell@scag.gov](mailto:andrewpowell@scag.gov).

/s/ Elizabeth Franklin-Best

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