

**RECEIVED**

**Feb 13 2025**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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Appeal from Colleton County  
The Honorable Clifton Newman, Circuit Court Judge

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THE STATE,

Respondent,

v.

LARRY E. KING,

Appellant.

Appellate Case No. 2023-001445

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

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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, which is currently due to be filed tomorrow, February 14, 2025. Opposing Counsel has graciously consented to all extensions through February 28, 2025. In support of this motion, counsel would show the following extraordinary circumstances:

1. Counsel prepared for and attended PCR Hearings in Greenville, South Carolina on January 29, 2025; and
2. Counsel prepared and filed the Initial Brief and Designation of Matter in the case of The State v. Rita M. Pangalangan, Appellate Case No. 2023-001446, on February 5, 2025, a matter

pending in the South Carolina Court of Appeals;

3. Counsel prepared and filed the Initial Brief of Respondent & Designation of Matter in the case of The State v. Jesse Dewitt Osborne, Appellate Case No. 2023-01596, on February 12, 2025, a matter pending in the South Carolina Court of Appeals;

4. Counsel prepared for and participated in a CLE round table discussion on February 12, 2025, via Zoom with the South Carolina Prosecution Coordination Commission regarding the recent Supreme Court decision in The State v. Robert X. Jeter, Appellate Case No. 2021-001408;

5. Counsel is working on the Final Brief of Respondent in the matter of The State v. Che Leon Ransom, Appellate Case No. 2023-001348, due February 18, 2025, a matter pending in the South Carolina Court of Appeals;

6. Moreover, this appeal has only recently been transferred to the undersigned. The undersigned was assigned the co-defendant's case and recently filed the brief in that case. That these cases involved co-defendants was inadvertently missed for initial assignment. Counsel is familiar with the transcript and should need no further time than that requested to complete the State's brief.

7. Counsel has been involved in working on other matters in state and federal court.

This is the fourth request for an extension in which to file the Initial Brief and Designation of Matter. This request is not made for the purpose of delay but because of the foregoing extraordinary circumstances.

WHEREFORE, the 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

DONALD J. ZELENKA  
Deputy Attorney General

MELODY J. BROWN  
Senior Assistant Deputy Attorney General

TOMMY EVANS, JR.  
Assistant Attorney General

By: Tommy Evans, Jr.  
TOMMY EVANS, JR.  
State ID No. 65282  
Office of the Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29211  
(803) 734-6305

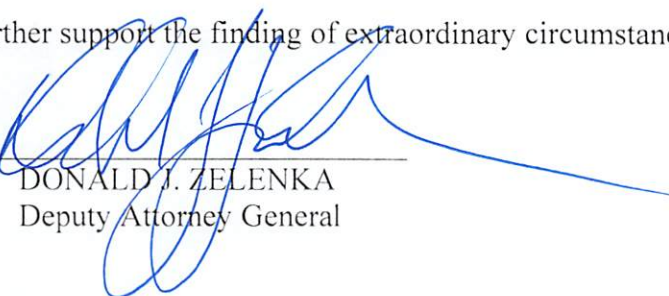
February 13, 2025.

ATTORNEY FOR RESPONDENT

I support the finding of extraordinary circumstances.

By:   
MELODY J. BROWN  
Senior Assistant Deputy Attorney General

I further support the finding of extraordinary circumstances.

By:   
DONALD J. ZELENKA  
Deputy Attorney General

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**PROOF OF SERVICE**

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I, **Tommy Evans, Jr.**, hereby certify that as per the March 20, 2020 Order of the Chief Justice, the Fourth Extension to file the Initial Brief of Respondent and Designation of Matter have been forwarded to Appellant's counsel, Kathrine Hudgins, via email today, February 13, 2025 to [KHudgins@sccid.sc.gov](mailto:KHudgins@sccid.sc.gov), and to her assistant, Chris Stock to [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 13th day of February 2025.

*s/Tommy Evans, Jr.*

Tommy Evans, Jr.

S.C. Bar No. 65282

Post Office Box 11549

Columbia, South Carolina 29211

ATTORNEY FOR RESPONDENT

## Brandy Rankin

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**From:** Brandy Rankin  
**Sent:** Thursday, February 13, 2025 11:33 AM  
**To:** Hudgins, Kathrine  
**Cc:** Stock, Chris; Tommy Evans, Jr.  
**Subject:** Fourth Motion for Extension to file Initial Brief & Designation of Matter - The State v. Larry E. King - Appellate Case No. 2023-001445  
**Attachments:** KING Fourth Extension (signed) to file Initial Brief & DOM.pdf

Dear Ms. Hudgins,

Please find attached the Respondent's Fourth Motion for Extension to file the Initial Brief and Designation of Matter. Also attached is the Proof of Service. These documents will be filed with the South Carolina Court of Appeals today, February 13, 2025, along with a copy of this email. Have a great day!

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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