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Mar 20 2025

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Greenville County

Perry H. Gravely, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

BRAELON JASPER BROWN,

APPELLANT.

APPELLATE CASE NO. 2024-001099

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

Counsel for Braelon Jasper Brown respectfully requests a **fourth and final thirty (30) day extension from March 20, 2025 until April 21, 2025** 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 Braelon Jasper Brown 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 her caseload, counsel hopes that no further extension requests will be required.

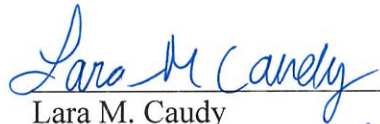
3. On March 17, 2025, counsel, along with co-counsel, filed the initial brief of appellant and designation of matter in The State v. Gregory Benjamin with the Court of Appeals. On March 11, 2025, counsel had an oral argument in The State v. Barry Jones before the Court of Appeals. On February 27, 2025, counsel filed the initial brief of appellant and designation of matter in The State v. Lorenzo Boles with the Court of Appeals. On February 12, 2025, counsel filed the initial brief of appellant and designation of matter in In the Matter of the Care and Treatment of Robert B. Sharp with the Court of Appeals. On February 5, 2025, counsel filed the petition for writ of certiorari and accompanying appendix in Heyward Rogers v. State with the Court of Appeals. On January 30, 2025, counsel filed the initial brief of appellant and designation of matter in The State v. Daniel Jones with the Court of Appeals. On January 23, 2025, counsel, along with co-counsel, filed the petition for rehearing in The State v. Bowen Turner with the Court of Appeals.

4. Counsel makes this request in good faith and not for purpose of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

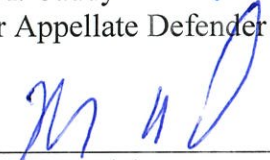
5. On March 3, 2025, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through March 31, 2025.

WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension from March 20, 2025 until April 21, 2025** in which to serve and file the Initial Brief of Appellant and Designation of Matter in this case based upon the above exigent circumstances.

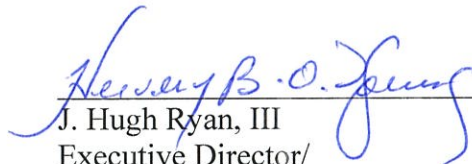
Respectfully submitted,



Lara M. Caudy
Senior 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 20th day of March, 2025.

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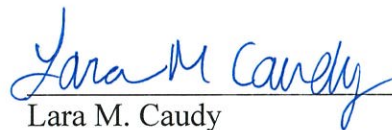
BRAELON JASPER BROWN,

APPELLANT.

APPELLATE CASE NO. 2024-001099

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 20th day of March, 2025.



Lara M. Caudy

Senior Appellate Defender

ATTORNEY FOR APPELLANT

From: [Mcinnis, Sara](#)
To: mbrown@scag.gov
Cc: abennett@scag.gov; [Caudy, Lara](#)
Subject: 2024-001099 The State v. Braelon J. Brown Extension 4
Date: Thursday, March 20, 2025 10:08:00 AM
Attachments: 2024-001099 The State v. Braelon J. Brown Extension 4.pdf

Good Morning Ms. Brown,

Attached for service in the above-referenced case is the fourth motion for extension, which will be filed with the Court of Appeals today, March 20, 2025, via email filing.

Thank you,

Sara McInnis

Administrative Assistant

South Carolina Commission on Indigent Defense

Appellate Division

(803) 734-1330