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Apr 07 2025

SC Court of Appeals

STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Horry County
The Honorable Benjamin Culbertson, Circuit Court Judge

THE STATE OF SOUTH CAROLINA,

Respondent,

v.

SAMANTHA FORD RABON,

Appellant.

Appellate Case No. 2024-000330

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

The undersigned counsel would respectfully request a thirty (30) day extension in which to file the Initial Brief of Respondent and Designation of Matter in the above-referenced case. Opposing counsel has graciously consented to all extensions through April 30, 2025. In support of this motion, counsel would respectfully show the Court the following:

Respondent's Initial Brief and Designation of Matter is due today, Monday, April 7, 2025, as per this Court's Order granting Respondent's second extension request. The undersigned attorney for the Respondent has had a number of state and federal matters to attend to since March 2024. Specifically,

1. Counsel prepared and filed the Initial Brief & Designation of Matter on March 17, 2025, in

the matter of The State v. Larry King, Appellate Case No. 2023-001445, a case pending in this Court;

2. Counsel assisted in preparing and filing the Brief of Respondent-Appellant and the Joint Appendix on March 24, 2025, in the matter of K. C. Langford v. Donnie Stonebreaker, Case 24-7118, a case pending in the United States Court of Appeals for the Fourth Circuit;

3. Counsel prepared and filed the Final Brief of Respondent on March 26, 2025 in the matter of The State v. Rita Pangalangan, Appellate Case No. 2023-001446, a matter pending in this Court;

4. Counsel prepared and filed the Return to Petition for Writ of Certiorari on March 27, 2025, in the matter of Jacoby Gregory v. State of South Carolina, Appellate Case No. 2024-000848, a matter pending in the South Carolina Supreme Court;

5. Counsel prepared and filed the Return and Memorandum of Law in Support of Summary Judgment and Motion for Summary Judgment on March 31, 2025, in the matter of Josh Reed, a/k/a Joshua Alexander Reed v. Warden of Perry Correctional Institution, C/A No. 9:24-cv-5978-SAL-MHC, a matter pending in the District Court;

6. Counsel is working on the Return to Petition for Writ of Certiorari due April 9, 2025, in the matter of The State v. Shantrez Alejandro Robertson, Appellate Case No. 2025-000353, a matter pending in the South Carolina Supreme Court;

7. This request is not made for the purpose of delay but due to the foregoing.

WHEREFORE, counsel respectfully requests a thirty (30) day extension of time to serve and file the Initial Brief 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: s/Tommy Evans, Jr.
TOMMY EVANS, JR.
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Columbia, South Carolina 29211
(803) 734-6305

ATTORNEY FOR RESPONDENT

April 7, 2025

[signature block continued next page]

I support the finding of good cause.

By: 

MELODY J. BROWN
Senior Assistant Deputy Attorney General

April 7, 2024

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Appellant.

Appellate Case No. 2024-000330

PROOF OF SERVICE

I, Tommy Evans, Jr., hereby certify that as per the March 20, 2020 Order of the Chief Justice, the Third Extension to file the Initial Brief of Respondent, Designation of Matter, and Proof of Service has been forwarded to Appellant's counsel, Gary Johnson via email today, April 7, 2025 to ghjohnson@sccid.sc.gov and to Mr. Johnson's assistant, Scott Leverette, sleverette@sccid.sc.gov.

I further certify that all parties required by Rule to be served have been served.

This is the 7th day of April 2025.

s/Tommy Evans, Jr.
Tommy Evans, Jr.
S.C. Bar No. 12990
Post Office Box 11549
Columbia, South Carolina 29211

ATTORNEY FOR RESPONDENT

Brandy Rankin

From: Brandy Rankin
Sent: Monday, April 7, 2025 11:23 AM
To: Johnson, Gary
Cc: Tommy Evans, Jr.; Leverett, Scott
Subject: The State of SC v. Samantha Ford Rabon - Motion for Third Extension to file Initial Brief of Respondent & Designation of Matter
Attachments: Motion for Third Extension of Time to file IBOR - Rabon.pdf

Dear Mr. Johnson,

Please find attached the Respondent's Third Motion for Extension to file the Initial Brief and Designation of Matter, along with the Proof of Service. These documents will be filed with the South Carolina Court of Appeals today, April 7, 2025, along with a copy of this email. Have a great day!

Sincerely,

Brandy Rankin

Brandy Rankin, Legal Assistant to Tommy Evans, Jr.
Office of the Attorney General
Post Office Box 11549
Columbia, South Carolina 29211
803-734-6305



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