

**RECEIVED**

**May 07 2025**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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

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THE STATE OF SOUTH CAROLINA,

Respondent,

v.

SAMANTHA FORD RABON,

Appellant.

Appellate Case No. 2024-000330

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

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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 May 31, 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, Wednesday, May 7, 2025, as per this Court's Order granting Respondent's third extension request. The undersigned attorney for the Respondent has had a number of state and federal matters to attend to since April 2024. Specifically,

1. Counsel prepared and filed the Return to Petition for Writ of Certiorari on 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;

2. Counsel prepared and filed the Final Brief of Respondent on April 14, 2025, in the matter of The State v. Jesse Dewitt Osborne, Appellate Case No. 2023-001596, a matter pending in this Court;

3. Counsel assisted in preparing and filing the Post Hearing Brief on April 18, 2025, in the Capital case of Bobby Wayne Stone v. State of South Carolina, Case #2018-CP-43-1025;

4. Counsel met with opposing counsel and reviewed evidence at the Lexington County Sherriff's Office on April 22, 2025, in the Capital Case of Gary Terry v. State of South Carolina, Case No. 2022-CP-32-024;

5. Counsel prepared and filed the Return and Memorandum of Law in Support of Summary Judgment and Motion for Summary Judgment on May 2, 2025, in the matter of Timothy C. Turbeville v. Warden of MacDougall Correctional Institution, C/A No. 5:25-cv-112-SAL-KDW, a matter pending in the District Court;

6. Counsel prepared and filed the Final Brief of Respondent on May 5, 2025 in the matter of The State v. Larry King, Appellate Case No. 2023-001445, a matter pending in this Court;

7. Counsel prepared and filed the Final Brief of Respondent on May 5, 2025, in the matter of The State v. Micah Pressley, Appellate Case No. 2023-001799, a matter pending in this Court;

8. Counsel prepared and presented Oral Argument on May 6, 2025 @ 10:40 AM in the matter of The State v. Justin Tyler Hopkins, Appellate Case No. 2022-001567, a matter pending in this Court;

9. Counsel is working on the Federal Habeas Return due today, May 7, 2025, in the matter of Toaby Alexander Trapp v. Warden Early-Perry C.I., Case No. 5:25-cv-0211-JD-KDW, a

matter pending in the District Court;

10. 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

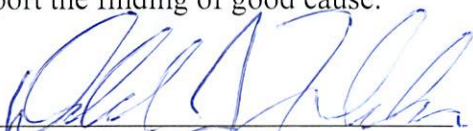
By: s/Tommy Evans, Jr.  
TOMMY EVANS, JR.  
No. 7448  
Office of the Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29211  
(803) 734-6305

ATTORNEY FOR RESPONDENT


May 7, 2025

*[signature block continued next page]*

I support the finding of good cause.

By:   
DONALD J. ZELENKA  
Deputy Attorney General

I, too, support the finding of good cause.

By:   
MELODY J. BROWN  
Senior Assistant Deputy Attorney General

May 7, 2024

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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, Designation of Matter, and Proof of Service has been forwarded to Appellant's counsel, Gary Johnson via email today, May 7, 2025 to [ghjohnson@sccid.sc.gov](mailto:ghjohnson@sccid.sc.gov) and to Mr. Johnson's assistant, Scott Leverette, [sleverette@sccid.sc.gov](mailto:sleverette@sccid.sc.gov).

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

This is the 7<sup>th</sup> day of May 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

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**From:** Brandy Rankin  
**Sent:** Wednesday, May 7, 2025 8:31 AM  
**To:** Johnson, Gary  
**Cc:** Tommy Evans, Jr.; Leverett, Scott  
**Subject:** The State v. Samantha Ford Rabon - Respondent's Fourth Extension to file Initial Brief & Designation of Matter - Appellate Case No. 2024-000330  
**Attachments:** Fourth Extension - Rabon.pdf

Dear Mr. Johnson,

Please find attached the Respondent's Fourth Extension to file the Initial Brief & Designation of Matter, along with the Proof of Service in the above-captioned case. These documents will be filed today, May 7, 2025, with the South Carolina Court of Appeals 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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