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May 19 2025

SC Court of Appeals

STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Lexington County
The Honorable Debra R. McCaslin, Circuit Court Judge

THE STATE OF SOUTH CAROLINA,

Respondent,

v.

DANIEL TAYLOR JONES,

Appellant.

Appellate Case No. 2024-000129

**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 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, Monday, May 19, 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 April 2024. Specifically,

1. 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;

2. 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;

3. 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;

4. 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;

5. 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;

6. 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;

7. Counsel prepared and filed the Federal Habeas Return 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;

8. 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

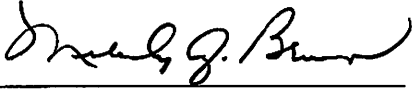
By: s/Tommy Evans, Jr.
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ATTORNEY FOR RESPONDENT

May 19, 2025

[signature block continued next page]

I support the finding of good cause.

By: 

MELODY J. BROWN
Senior Assistant Deputy Attorney General

May 19, 2024

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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, Lara M. Caudy via email today, May 19, 2025 to lcaudy@sccid.sc.gov and to Ms. Caudy's assistant, Sara McInnis, to smcinnis@sccid.sc.gov.

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

This is the 19th 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