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**Jun 20 2025**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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Appeal from Charleston County  
The Honorable Deadra L. Jefferson, Circuit Court Judge

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THE STATE,

Respondent,

v.

KARSEEM NICHOLAS HARDAWAY,

Appellant.

Appellate Case No. 2024-001245

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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 serve and file the Initial Brief of Respondent and Designation of Matter in the above-referenced case. Opposing counsel has graciously consented to all extension requests through June 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 Monday, June 23, 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 May 2025 when the Court granted Respondent's second extension. Specifically:

1. Counsel prepared a litigation timeline and compiled corresponding documents to be forwarded to the State's expert in the Abbeville County, capital post-conviction relief matter

of Steven Bixby, #006024 vs. State of South Carolina, Case No. 2024-CP-01-00375, on May 21, 2025;

2. Counsel prepared and filed the Return and Memorandum of Law in Support of Motion for Summary Judgment in the matter of Devon Michael Ford vs. Levern Cohen, Warden of Ridgeland Correctional Institution, Case No. 8:25-cv-0593-JD-WSB on Tuesday, May 27, 2025;

3. Counsel prepared and filed the Return to Petition for Writ of Certiorari in the matter of The State v. Charles Jason Carmichael, Appellate Case No. 2025-000686, on May 30, 2025, a matter pending in the South Carolina Supreme Court;

4. Counsel prepared and filed the Reply to Response in Opposition to Motion for Summary Judgment [ECF #35] in the matter of Robert L. O'Shields v Warden of Tyger River, Case No. 5:24-cv-6272-BHH-KDW on June 3, 2025;

5. Counsel prepared and filed the Final Brief of Respondent on June 17, 2025, in the matter of The State v. Stephen D. O'Hara, Appellate Case NO. 2024-000097;

6. Counsel attended the competency to be executed evaluation for inmate John Richard Wood, in the capital murder post-conviction relief action: John Richard Wood v. State of South Carolina, Case No. 2022-CP-23-06219, today, June 18, 2025;

7. Counsel is preparing and will file the Initial Brief & Designation of Matter in the matter of The State v. Darius Grant Dickey, Appellate Case No. 2024-000145 today, June 20, 2025;

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

Due to counsel's involvement in these and other matters pending in court, counsel has been unable to timely complete the Initial Brief of Respondent and Designation of Matter.

WHEREFORE, counsel respectfully requests a thirty (30) day extension of time to serve and file the Initial Brief of Respondent and Designation of Matter. This request is made in good faith, and not for the purposes of delay.

Respectfully Submitted,

ALAN WILSON  
Attorney General

DONALD J. ZELENKA  
Deputy Attorney General

MELODY J. BROWN  
Senior Assistant Deputy Attorney General  
S.C. Bar No: 14244

W. JOSEPH MAYE  
Assistant Attorney General  
S.C. Bar No. 100851

Office of the Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29211  
(803) 734-6305

By: s/W. Joseph Maye  
W. Joseph Maye  
Assistant Attorney General  
ATTORNEYS FOR RESPONDENT

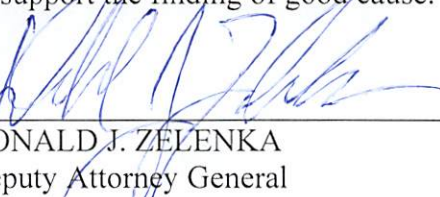
June 20, 2025

[signature block continues next page]

I support the finding of good cause.

By:   
\_\_\_\_\_  
MELODY J. BROWN  
Senior Assistant Deputy Attorney General

I, too, support the finding of good cause.

By:   
\_\_\_\_\_  
DONALD J. ZELENKA  
Deputy Attorney General

June 20, 2025

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**PROOF OF SERVICE**

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I, W. Joseph Maye, hereby certify that as per the March 20, 2020 Order of the Chief Justice, the Respondent's fourth Motion for Extension of Time to file the Initial Brief & Designation of Matter has been forwarded to Appellant's counsel, Jordan Wayburn, Esquire, via email today, June 20, 2025 to [jwayburn@sccid.sc.gov](mailto:jwayburn@sccid.sc.gov) and to his assistant, Chris Stock at [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 20th day of June 2025.

s/W. Joseph Maye  
W. Joseph Maye  
Assistant Attorney General

## Brandy Rankin

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**From:** Brandy Rankin  
**Sent:** Friday, June 20, 2025 8:34 AM  
**To:** jwayburn@sccid.sc.gov  
**Cc:** Joe Maye; cstock@sccid.sc.gov  
**Subject:** The State v. Karseem Nicholas Hardaway - Fourth Extension to file Initial Brief of Respondent & Designation of Matter - Appellate Case No. 2024-001245  
**Attachments:** SIGNED Fourth Extension to file the Initial Brief - Hardaway.pdf

Good morning!

Inadvertently an unedited copy of the Fourth Extension in the above-captioned case was emailed to you, our apologies. The attached copy here is the one which will be filed with the South Carolina Court of Appeals today, June 20, 2025, along with a copy of this email. Thank you.

Sincerely

*Brandy Rankin*

Brandy Rankin, Legal Assistant to W. Joseph Maye  
Office of the Attorney General  
Post Office Box 11549  
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803-734-6305



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