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**Jul 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 H. Culbertson, Circuit Court Judge

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THE STATE,

Respondent,

v.

CALVIN D. FORD,

Appellant.

Appellate Case No. 2024-001870

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**MOTION FOR THIRD 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 July 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, July 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 June 2025. Specifically,

1. Counsel prepared and provided to the Honorable Robert E. Hood the Proposed Order of Dismissal in the Capital PCR Action of Gary Dubose Terry, #5054 v. State of South Carolina,

C/A No. 2022-CP-32-00924, on June 2, 2025;

2. Counsel prepared and filed the Initial Brief and Designation of Matter in the case of The State of South Carolina v. Samantha Ford Rabon, Appellate Case No. 2024-000330 on June 6, 2025, a matter pending in this Court;

3. Counsel prepared and presented Oral Argument in the matter of The State v. Jeremy Savoy Cornish, Appellate Case No. 2022-001536 on June 11, 2025 @ 10:40 am, a matter pending in this Court;

4. Counsel filed the Return and Memorandum of Law in Support of Summary Judgment and Motion for Summary Judgment on June 26, 2025, in the matter of Daniel S. Means v. Warden Jackson, C/A No. 0:24-cv-7497-BHH-PJG, a matter pending in the District Court;

5. Counsel is working on the Initial Brief and Designation of Matter in the case of The State v. Karseem Nicholas Hardaway, Appellate Case No. 2024-001245 due on July 23, 2025, a matter pending in this Court and for which there are no more extensions;

6. 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

I support the finding of good cause.

By: 

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

July 7, 2025

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**PROOF OF SERVICE**

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I, Tommy Evans, Jr., certifies that pursuant to Rule 262(c)(3), SCACR and the Supreme Court order of April 24, 2024, the third extension to file the Initial Brief of Respondent, Designation of Matter and Proof of Service have been forwarded to Appellant's counsel, Jessica M. Saxon via email today, July 7, 2025 to [jsaxon@sccid.sc.gov](mailto:jsaxon@sccid.sc.gov) and to Ms. Saxon's assistant, Scott Leverette, to [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 July 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:** Monday, July 7, 2025 11:13 AM  
**To:** Saxon, Jessica  
**Cc:** Leverett, Scott; Tommy Evans, Jr.  
**Subject:** The State v. Calvin D. Ford - Third Motion for Extension to file Initial Brief of Respondent & Designation of Matter - Appellate Case NO. 2024-001870  
**Attachments:** (Signed )Third Extension to file IBOR-DOM - Carroll.pdf

Dear Ms. Saxon,

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

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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