

**RECEIVED**

**Jul 07 2025**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Beaufort County  
The Honorable Brooks Goldsmith, Circuit Court Judge

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THE STATE,

RESPONDENT,

v.

STEPHEN QUINTON POLITE,

APPELLANT.

Appellate Case No. 2024-000692

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

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Respondent, the State, moves this Court for an additional thirty (30) day extension of time up to and including August 6, 2025, in which to file the Initial Brief of Respondent and Designation of Matter. The Initial Brief and Designation of Matter is currently due to be filed on Monday, July 7, 2025. Opposing Counsel has graciously consented to this extension request. This is Respondent's fourth request for an extension of time in which to file the Brief. In support of the request, undersigned counsel for Respondent would respectfully show unto the Court the following extraordinary circumstances:

1. Counsel filed the Respondent's Reply to Response in Opposition to Motion to Strike [ECF #34] in the matter of Jerel Marquis Heriot vs. Lashawn Peeples, C/A No. 1:24-7237-SAL-SVH on June 4, 2025;
2. Counsel filed the Respondent's response to Motion for Preliminary Injunction [ECF #52] in the matter of Theodore J. Bolick, a/k/a Theodore Jerry Bolick vs. Donnie Stonebreaker, C/A No. 5:24-7662-MGL-KDW on June 6, 2025;

3. Counsel filed the Respondent's Reply to Response in Opposition to Motion to Dismiss [ECF #57] in the matter of Theodore J. Bolick, a/k/a Theodore Jerry Bolick vs. Donnie Stonebreaker, C/A No. 5:24-7662-MGL-KDW on June 10, 2025;
4. Counsel filed the Respondent's Response to Motion to Appoint Counsel [ECF #35] in the matter of Jerel Marquis Heriot vs. Lashawn Peeples, C/A No. 1:24-7237-SAL-SVH on June 11, 2025;
5. Counsel filed the Respondent's Reply to Response in Opposition to Motion for Summary Judgment [ECF #37] in the matter of Jerel Marquis Heriot vs. Lashawn Peeples, C/A No. 1:24-7237-SAL-SVH which on June 13, 2025;
6. Counsel prepared and filed the Initial Brief of Respondent in the Lexington County direct appeal matter of The State vs. Nazareth N. Sanchez-Peralta, Appellate Case No. 2023-001588 on June 24, 2025; and
7. Counsel filed the Respondent's Reply to Response to Objections to Report and Recommendation [ECF #34] in the matter of Jamal Hakeem vs. Warden of Turbeville Correctional Institution, C/A No. 1:24-6658-CMC-SVH on June 20, 2025;
8. Counsel also filed the Respondent's Reply to Response to Motion to Correct [ECF #48] in the matter of Trevin Milledge vs. Warden Laverne Cohen, C/A No. 8:24-05201-MGL-WSB on June 30, 2025;
9. Counsel is currently preparing the Return and Memorandum of Law in Support of Motion for Summary Judgment in the matter of Billy Ray Smith vs. Warden, Perry Correctional Institution, C/A No. 1:25-cv-692-CMC-SVH which is due today, July 3, 2025; and
10. Counsel has been involved in working **on other matters in state and federal court.**

Thus, counsel respectfully requests a thirty (30) day extension of time to allow counsel to complete the Initial Brief of Respondent. This is Respondent's fourth request for additional time to do so.

WHEREFORE, undersigned counsel for Respondent respectfully requests an additional extension of thirty (30) days to complete the Initial Brief of Respondent in this matter.

Respectfully submitted,

ALAN WILSON  
Attorney General

DONALD J. ZELENKA  
Deputy Attorney General

MELODY J. BROWN  
Senior Assistant Deputy Attorney General

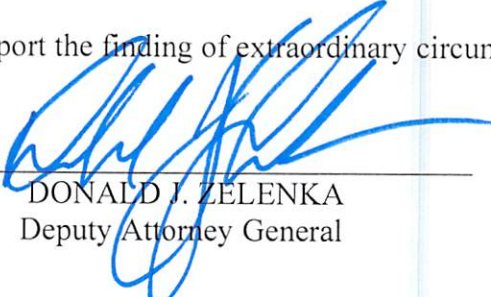
R. BRANDON LARRABEE  
Assistant Attorney General  
State Bar No. 104865

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By: s/ R. Brandon Larrabee  
R. BRANDON LARRABEE  
ATTORNEYS FOR RESPONDENT

July 3, 2025.

I support the finding of extraordinary circumstances.

By:   
DONALD J. ZELENKA  
Deputy Attorney General

I further support the finding of extraordinary circumstances.

By:   
W. JEFFREY YOUNG  
Chief Deputy Attorney General

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**PROOF OF SERVICE**

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I, **R. Brandon Larrabee**, attorney for the Respondent, hereby certify that as per the March 20, 2020 Order of the Chief Justice, the Motion for a fourth Extension of Time to File Initial Brief of Respondent and Designation of Matter, have been forwarded to Appellant's counsel, Jack B. Swerling, Esq. via email today, July 3, 2025 to jacklaw@aol.com.

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

This 3<sup>rd</sup> day of July, 2025.

*s/R. Brandon Larrabee*  
R/ BRANDON LARRABEE  
Assistant Attorney General