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**Jul 21 2025**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal From Greenville County  
The Honorable Perry H. Gravely, Circuit Court Judge

Appellate Case No: 2024-000425

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THE STATE,

Respondent,

vs.

JAMES BROWN,

Appellant.

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**MOTION FOR FOURTH EXTENSION OF TIME WITHIN WHICH TO SERVE AND  
FILE THE INITIAL BRIEF OF RESPONDENT AND DESIGNATION OF MATTER**

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Respondent, through its undersigned counsel, would respectfully show unto this Court as follows:

I.

The Initial Brief of Respondent and Designation of Matter are due to the Court today, pursuant to three previous extensions granted by the Court.

II.

Pursuant to RE: Extension Requests in Criminal Direct Appeals and Post-Conviction Relief Certiorari Proceedings: Order of the South Carolina Supreme Court dated March 18, 2009, the Respondent moves for a **fourth** extension in the above referenced appeal. Due to work required in other cases pending before this Court, the undersigned counsel is unable to complete this Brief on time. Since the last extension was granted in this matter, the undersigned counsel has filed an Initial Brief of Respondent and Designation of Matter in The State v. Measha Jacquetta

Shawnic Joyner (2024-000274); has filed a Petition for Writ of Certiorari and Appendix In the Interest of Khalid J. (2022-000413); and has filed an Initial Brief of Respondent and Designation of Matter in The State v. Tiffany Rebecca Owens (2024-000084). Counsel would therefore request an extension of time within which to serve and file the Initial Brief of Respondent and Designation of Matter.

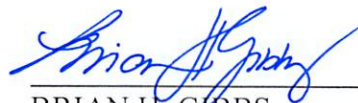
III.

The undersigned counsel submits this extension request is supported by extraordinary circumstances and is not intended for purposed of delay. The undersigned counsel is currently working on this Brief in this case and intends to have it finished in a timely manner. Accordingly, to ensure the Brief is properly researched and prepared, I would therefore request an additional extension of time within which to serve and file the Brief.

**WHEREFORE**, Respondent prays that the Court extend the deadline for the service and filing of the Initial Brief of Respondent and Designation of Matter in this case for thirty (30) days; and for such other and further relief as the Court may deem just and proper.

Respectfully submitted,

ALAN WILSON  
Attorney General




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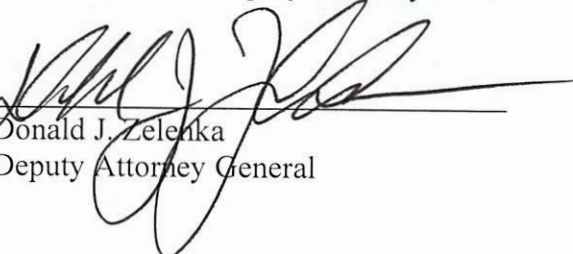
BRIAN H. GIBBS  
Assistant Attorney General  
S. C. Bar No: 104137

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Columbia, SC 29211  
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ATTORNEYS FOR RESPONDENT

I have reviewed and approved this extension request.

By:   
Mark R. Farthing  
Senior Assistant Deputy Attorney General

By:   
Donald J. Zelenka  
Deputy Attorney General

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**PROOF OF SERVICE**

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I, Grace Sommer, certify that I have served the Motion for Extension of Time on Gary H. Johnson, II, Esquire, counsel of record for the Appellant, by sending one copy by electronic mail to the address listed for counsel in AIS.

I further certify that all parties required by Rule to be served have been served.  
This 21<sup>st</sup> day of July, 2025.



GRACE SOMMER  
Legal Assistant

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