

**RECEIVED**

**Jul 23 2025**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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Appeal from Colleton County  
The Honorable Robert J. Bonds, Circuit Court Judge

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THE STATE,

Respondent,

v.

JUSTIN COLE CARROLL,

Appellant.

Appellate Case No. 2024-000722

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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 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, Wednesday, July 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 June 2025. Specifically,

1. 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 this Court;

2. Counsel prepared and filed the Initial Brief and Designation of Matter on July 18, 2025, in the matter of The State v. Daniel Taylor Jones, Appellate Case No. 2024-000129, this is a matter pending in the South Carolina Court of Appeals;

3. Counsel is working on the Initial Brief of Respondent and Designation of Matter in the case of The State v. Karseem Nicholas Hardaway, Appellate Case No. 2024-001245, the case is newly assigned and is due today July 23, 2025, and for which no other extensions are available, this is a matter pending in the South Carolina Court of Appeals;

4. Counsel is working on the Motion for Summary Judgment and Return and Memorandum of Law in Support of Summary Judgment in the matter of Geordi Jerrell Heyward v. Warden of Turbeville Correctional Institution, C/A No. 8:25-cv-1420-JDA-WSB, due on July 30, 2025, a matter pending in this court;

5. Counsel is working on other state and federal matters, and 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

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Columbia, South Carolina 29211


(803) 734-6305

ATTORNEY FOR RESPONDENT

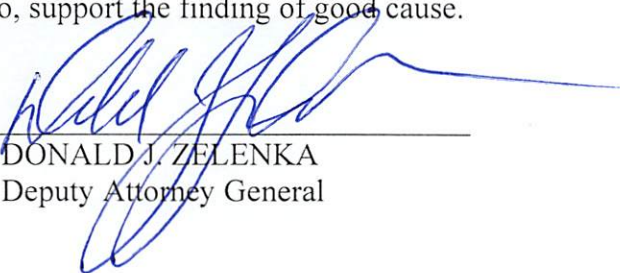
July 23, 2025

*[signature block continued 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

July 23, 2025

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**PROOF OF SERVICE**

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The undersigned certifies that pursuant to Rule 262(c)(3), SCACR and the Supreme Court order of April 24, 2024, the Fourth Extension to file the Initial Brief of Respondent, Designation of Matter, and Proof of Service have been forwarded to Appellant's counsel, David Alexander via email today, July 23, 2025 to [dalexander@sccid.sc.gov](mailto:dalexander@sccid.sc.gov) and to his assistant, Gage Timberlake, to [gtimberlake@sccid.sc.gov](mailto:gtimberlake@sccid.sc.gov).

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

This is the 23rd 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:** Wednesday, July 23, 2025 9:43 AM  
**To:** Alexander, David  
**Cc:** gtimberlake@sccid.sc.gov; Tommy Evans, Jr.  
**Subject:** The State v. Justin Cole Carroll - Fourth Motion for Extension to file Initial Brief & Designation of Matter  
**Attachments:** Signed Fourth Motion for Extension to file Initial Brief & Designation of Matter - Carroll.pdf

Dear Mr. Alexander,

Please find attached the Respondent's Fourth Motion for Extension to file the Initial Brief & Designation of Matter. Also attached is the Proof of Service. These documents will be filed with the South Carolina Court of Appeals today, July 23, 2025, along with a copy of this email. Have a great day!

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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