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Jul 28 2025
SC Court of Appeals

STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Charleston County

The Honorable Deadre Jefferson, Circuit Court Judge

THE STATE OF SOUTH CAROLINA,

Respondent,

v.

MELSHAUN ANTWAN ROBINSON,

Appellant.

Appellate Case No. 2024-001124

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

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 this extension via email. 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 28, 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 when the Court granted Respondent's second extension. Specifically:

1. Counsel prepared and filed the Return and Memorandum of Law in Support of Summary Judgment and Motion for Summary Judgment in the matter of *Levern*

McCrea a/k/a Leverne McCrea v. Warden Bailey, C/A No. 4:25-cv-2680-DCN-KDW on June 23, 2025;

2. Counsel prepared and submitted for filing the Return and Motion to Dismiss in the PCR Action of *Stephon Hawkins v. State of South Carolina*, Case No. 2021-CP-23-5610 on June 25, 2025;
3. Counsel prepared and submitted the proposed Conditional Order of Dismissal to the Honorable Perry H. Gravely, Chief Administrative Judge for the Thirteenth Circuit in the Court of Common Pleas, in the PCR Action of *Stephon Hawkins v. State of South Carolina*, Case No. 2021-CP-23-5610 on June 25, 2025.
4. Counsel completed and submitted for filing the Return in the Post-Conviction Relief Action of *Makel Mayfield v. State of South Carolina*, Case No. 2024-CP-23-1316, on June 23, 2025;
5. Counsel prepared and submitted for filing the Return in the Post-Conviction Relief Action of *Eric Peterson v. State of South Carolina*, Case No: 2023-CP-23-5708 on June 26, 2025;
6. Counsel completed and submitted for filing the Return in the Post-Conviction Relief Action of *Jorge Luna v. State of South Carolina*, Case No: 2024-CP-23-4707 on June 26, 2025;
7. Counsel completed and submitted for filing the Return in the Post-Conviction Relief Action of *Joshua Garrett v. State of South Carolina*, Case No: 2024-CP-23-1405 on July 1, 2025;
8. Counsel prepared and submitted for filing the Return in the Post-Conviction Relief Action of *Samantha Pfau v. State of South Carolina*, Case No: 2024-CP-23-6785 on

July 2, 2025;

9. Counsel completed and submitted for filing the Return in the Post-Conviction Relief Action of *Zachary Powell v. State of South Carolina*, Case No: 2024-CP-39-0771 on July 7, 2025;
10. Counsel completed and submitted for filing the the Return and Motion to Dismiss in the PCR Action of *Veronica Tharp v. State of South Carolina*, Case No: 2023-CP-23-4160 on July 11, 2025;
11. Counsel completed and submitted the proposed Conditional Order of Dismissal to the Honorable Perry H. Gravely, Chief Administrative Judge for the Thirteenth Circuit in the Court of Commonm Pleas, in the PCR Action of *Veronica Tharp v. State of South Carolina*, Case No: 2023-CP-23-4160 on July 11, 2025;
12. Counsel prepared and submitted for filing the Return in the Post-Conviction Relief Action of *Javis Lamar Smith v. State of South Carolina*, Case No: 2025-CP-23-2028 on July 14, 2025;
13. Counsel completed and submitted for filing the the Return and Motion to Dismiss in the PCR Action of *James Russell v. State of South Carolina*, Case No: 2023-CP-23-4075 on July 16, 2025;
14. Counsel completed and submitted the proposed Conditional Order of Dismissal to the Honorable Perry H. Gravely, Chief Administrative Judge for the Thirteenth Circuit in the Court of Commonm Pleas, in the PCR Action of *James Russell v. State of South Carolina*, Case No: 2023-CP-23-4075 on July 16, 2025;
15. Counsel prepared and filed the Return and Memorandum of Law in Support of Summary Judgment and Motion for Summary Judgment in the matter of *Charles*

Jacob Bridges a/k/a Charles J. Bridges v. Warden of Lieber Correctional Institution,
C/A No. 5:25-1372-RMG-KDW on July 18, 2025;

Due to counsel's involvement in the above referenced actions as well as involvement in additional pending collateral and appellate matters, counsel has been unable to 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

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Kaylee C. Kemp

s/ _____
KAYLEE C. KEMP

ATTORNEYS FOR RESPONDENT

July 28, 2025
Columbia, South Carolina

[Signature Page to Follow]

I support the finding of good cause.

By: 

MELODY J. BROWN
Senior Assistant Deputy Attorney General

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PROOF OF SERVICE

The undersigned certifies that pursuant to Rule 262(c)(3), SCACR, and the Supreme Court Order dated April 24, 2024, the Third Extension of Time to File the Initial Brief of Respondent and Designation of Matter has been forwarded to Appellant's counsel, Dayne Phillips, Esq., via email today, July 28, 2025, at dayne@pricebenowitz.com.

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

This is the 28th day of July 2025.

Kaylee C. Kemp

s/ _____

KAYLEE C. KEMP
Assistant Attorney General