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Aug 04 2025
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY
Court of General Sessions

Benjamin H. Culbertson, Circuit Court Judge

Appellate Case No. 2024-001460

THE STATE,

Respondent,

v.

NASIREA BREWNOPLIS JEROME GRATE,

Appellant.

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

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 two 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 third 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 Joyner* (2024-000274); has filed a Final Brief of Respondent in *The State v. Tiffany Rebecca Owens* (2024-000085); and has filed a Petition for Writ of Certiorari and Appendix for *In the Interest of Khalid J.* (2022-000413). Therefore, Counsel requests an extension of time within which to serve and file the Initial Brief of Respondent and Designation of Matter in this case.

III.

This extension request is not intended for purposes of delay, but rather to ensure that the Brief is properly researched and prepared.

WHEREFORE, Respondent requests 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



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

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Attorneys for Respondent

I have reviewed and approved this extension request.

By: 

MARK R. FARTHING

Senior Assistant Deputy Attorney General

August 4, 2025

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Appellant.

PROOF OF SERVICE

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 4th day of August, 2025.



GRACE SOMMER
Legal Assistant

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