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Aug 06 2025

SC Court of Appeals

STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Horry County
The Honorable Benjamin H. Culbertson, Circuit Court Judge

THE STATE OF SOUTH CAROLINA,

Respondent,

v.

CALVIN D. FORD,

Appellant.

Appellate Case No. 2024-001870

**MOTION FOR FOURTH 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 file the Initial Brief of Respondent and Designation of Matter in the above-referenced case. Opposing counsel has graciously consented to all extensions through August 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, August 6, 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 July 2025. Specifically,

1. 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;

2. Counsel prepared and filed the Initial Brief of Respondent and Designation of Matter on July 23, 2025, in the case of The State v. Karseem Nicholas Hardaway, Appellate Case No. 2024-001245, a case pending in this Court;

3. Counsel prepared and filed the Motion for Summary Judgment and Return and Memorandum of Law in Support of Summary Judgment on July 30, 2025, in the matter of Geordi Jerrell Heyward v. Warden of Turbeville Correctional Institution, C/A No. 8:25-cv-1420-JDA-WSB, a matter pending in the District Court;

4. Counsel prepared and filed with opposing counsel the Respondent's First Set of Interrogatories on August 4, 2025 in the capital matter of Timothy Ray Jones, #5289 v. State of South Carolina, a Post-Conviction Relief matter, C/A No: 2024-CP032001312;

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

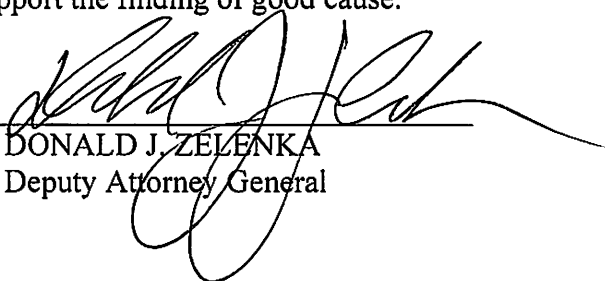
Office of the Attorney General
Post Office Box 11549
Columbia, South Carolina 29211
(803) 734-6305

ATTORNEY FOR RESPONDENT

August 6, 2025

[signature block continued next page]

I support the finding of good cause.

By: 
DONALD J. ZELENKA
Deputy Attorney General

August 6, 2025

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PROOF OF SERVICE

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, August 6, 2025 to jsaxon@sccid.sc.gov and to her assistant, Kaylynn Warren, to kwarren@sccid.sc.gov.

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

This is the 6th day of August 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

From: Brandy Rankin
Sent: Wednesday, August 6, 2025 11:21 AM
To: Saxon, Jessica
Cc: Warren, Kaylynn; Tommy Evans, Jr.
Subject: The State v. Calvin D. Ford - Fourth Motin for Extension to file the Initial Brief of Respondent & Designation of Matter - Appellate Case No. 2024-001870
Attachments: FORD - SIGNED - Fourth Extension to file Initial Brief and Designation of Matter.pdf

Dear Ms. Saxon,

Please find attached the Respondent's Fourth Motion for Extension to file the Initial Brief & Designation of Matter. These documents will be filed with the South Carolina Court of Appeals, today, August 6, 2025 along with a copy of this email. Thank you.

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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