

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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**RECEIVED**

**Aug 20 2025**

**SC Court of Appeals**

APPEAL FROM RICHLAND COUNTY  
Court Of Common Pleas  
Circuit Court Case No. 2024CP4001737

The Honorable Kristi Curtis, Circuit Court Judge

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Appellate Case No.2025 - 000762

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Alonzo C. Jeter, III, .....Appellant,

v.

State of South Carolina, Alan McCrory Wilson, Chelsey F. Marto,  
Joseph Derham Cole, Mark J. Hayes, II, Ralph Keith Kelly,  
Brandy W. McBee, Tonnya K. Kohn, Jean Hoefler  
Toal, Donald W. Beatty. . . . Respondents.

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**MOTION FOR LEAVE TO FILE OUT OF TIME**

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Attorney General Wilson and the State of South Carolina respectfully move for leave to file one day out of time his Reply to Appellant's Return to his Motion to Strike.

Appellant's certificate of service states that it was mailed on August 11, 2025, but the postmark on the envelope is August 12. Accordingly, under Rules 240 and 263, the Reply was not due until August 19, yesterday. The Office of the Attorney General did not receive the Return until August 14 so today is the fourth business day after receipt. The Reply was not circulated to undersigned counsel until August 18, two days ago, by email. Counsel opened the email late yesterday. He regrets this brief delay and respectfully requests that this Reply be accepted today.

Respectfully submitted,

ALAN WILSON  
Attorney General

W. JEFFREY YOUNG  
Chief Deputy Attorney General

s/J. Emory Smith, Jr.  
J. EMORY SMITH, JR.  
General Counsel  
S.C. Bar No. 5262

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ATTORNEYS FOR THE STATE AND ATTORNEY  
GENERAL

August 20, 2025