

RECEIVED

Aug 27 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 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 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, Wednesday, August 27, 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 when the Court granted Respondent's second extension. Specifically:

1. Counsel assisted and attended the capital post-conviction relief merits hearing/trial in the Lexington County matter of Norman Starnes v. State of South Carolina, C/A 2011-CP-32-830 from Monday, July 28, 2025, through Wednesday, July 30, 2025;

2. Within the last month, counsel prepared for the evidentiary and motion hearings in the following actions for the August 11-14, 2025, Post-Conviction Relief Term of Court in the 13th Circuit: Natasha Booker v. The State, (2024-CP-23-5082, 2024-CP-23-5429); Javis Smith v. The State, (2025-CP-23-2028); Jeff Williamson v. The State, (2025-CP-23-2375); Tony Leamon v. The State, (2021-CP-23-1591); William Wilkinson, III v. The State, (2025-CP-23-634); Sheldon Watson v. The State, (2022-CP-23-2311); Samantha Pfau v. The State, (2024-CP-23-6785); Brandon Cox v. The State, (2020-CP-39-1293); Gerald Gadsden v. The State, (2020-CP-23-1971); Michael Sullivan v. The State, (2021-CP-23-2865); Jahru Smith v. The State, (2023-CP-23-0273); Jaron Gibbs v. The State, (2023-CP-39-0651); Joshua Garrett v. The State, (2024-CP-23-1505); Kendrell Warren v. The State, (2022-CP-23-5790); Timiya Massey v. The State, (2022-CP-23-2305); James Durham v. The State, (2022-CP-39-0317); John Hughes v. The State, (2022-CP-23-1462); Kent Washington v. The State, (2022-CP-23-4649); Jeffery Mullins v. The State, (2022-CP-23-3986).

3. Counsel prepared and submitted Returns, Motions to Dismiss, and Conditional Orders on August 18-19, 2025, in the following Post-Conviction Relief actions: Leon Crump v. The State, (2018-CP-23-5731); William Newton v. The State, (2022-CP-23-3291); Elliot Hatton v. The State, (2020-CP-23-03397); Federick Anderson v. The State, (2020-CP-23-4799); Comest Allen v. The State, (2024-CP-23-6068); Dexter Bowens v. The State, (2022-CP-23-6435).

4. Counsel filed the Initial Brief and Designation of Matter and the Amended Initial Brief, on August 21, 2025, in the case of The State v. Denardis Jamont Kilgo, Appellate Case No.

2024-000567, a matter pending in this Court;

5. Counsel is working on other state and federal matters and this motion is not made for the purposes of delay but due to the foregoing.

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.

Respectfully Submitted,

ALAN WILSON
Attorney General

DONALD J. ZELENKA
Deputy Attorney General

MELODY J. BROWN
Senior Assistant Deputy Attorney General

KAYLEE C. KEMP
Assistant Attorney General
S.C. Bar No: 107073

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

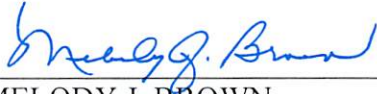
s/Kaylee C. Kemp
KAYLEE C. KEMP

ATTORNEYS FOR RESPONDENT

August 27, 2025
Columbia, South Carolina

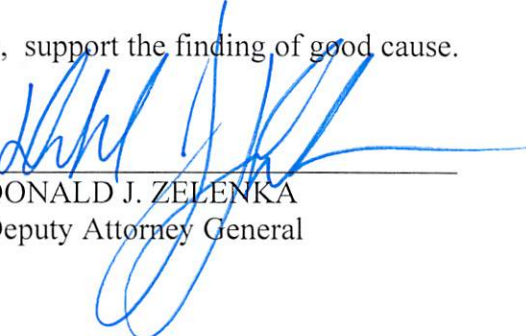
[Signature Page to Follow]

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

RECEIVED

Aug 27 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

PROOF OF SERVICE

The undersigned certifies that pursuant to Rule 262(c)(3), SCACR, and the Supreme Court Order dated April 24, 2024, the Fourth 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, August 27, 2025, at dayne@pricebenowitz.com.

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

This is the 27th day of August 2025.

s/Kaylee C. Kemp
KAYLEE C. KEMP
Assistant Attorney General

Brandy Rankin

From: Brandy Rankin
Sent: Wednesday, August 27, 2025 10:24 AM
To: dayne@pricebenowitz.com
Cc: courtney@pricebenowitz.com; Kaylee Kemp
Subject: Fourth Extension to file Initial Brief of Respondent and Designation of Matter - Melshaun Robinson - Appellate Case No. 2024-001124
Attachments: Fourth Extension to file IBOR-DOM - Executed - Robinson.pdf

Dear Mr. Phillips,

Please find attached the Respondent's Fourth Motion for Extension to file the Initial Brief & Designation of matter together with the Proof of Service. These documents will be filed with the South Carolina Court of Appeals today, August 27, 2025, along with a copy of this email. Have a great day!

Sincerely,

Brandy Rankin

Brandy Rankin, Legal Assistant to Kaylee C. Kemp
Office of the Attorney General
Post Office Box 11549
Columbia, South Carolina 29211
803-734-6305



This email, together with any attachments, may be legally privileged. If you have received it in error, please notify the sender immediately, and then delete it from your system. This email and any replies to this email may be subject to disclosure under the Freedom of Information Act.