

**RECEIVED**

**Sep 22 2025**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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Appeal from Greenville County  
The Honorable Alex Kinlaw, Jr., Circuit Court Judge

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THE STATE,

Respondent,

v.

TYRIESE N. ROBINSON,

Appellant.

Appellate Case No. 2024-000963

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

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Undersigned counsel would respectfully request a thirty (30) day extension up to and including October 22, 2025, 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 all extension requests through September 30, 2025. In support of this motion, counsel would respectfully show the Court the following:

Respondent's Initial Brief and Designation of matter are due today, September 22, 2025. Pursuant to this Court's Order dated August 21, 2025. Undersigned counsel has been associated with the appeal in helping complete the brief. The brief is substantially completed and is awaiting review and final edits to be completed. However, counsel requires additional

time to complete the review and edits due to counsel's involvement in these and other matters. Specifically, counsel has filed a 59(e) motion in a PCR action (*Christopher Smith, September 3, 2025*); assisted in a PCR hearing in Union County on September 8, 2025; filed Return to PCR Applications (*Daniel Palmino, Gary Nelson and Aaran Caper, September 9, 2025*); counsel is currently working of drafting orders from the August, 2025 9<sup>th</sup> Circuit PCR term of court (*Devon Mallard, Tarrell Richardson and Cary Stephens*); finally, counsel is currently preparing for a 14<sup>th</sup> Circuit PCR term scheduled for September 22 – 26, 2025).

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

KYLEE M. KANEALEY  
Assistant Attorney General

Post Office Box 11549  
Columbia, South Carolina 29211  
(803) 734-6305

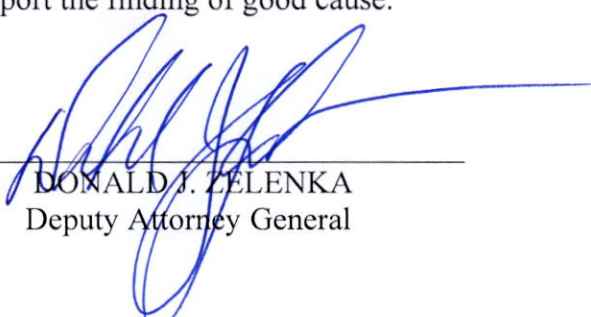
*s/Kylee M. Kanealey*

By: \_\_\_\_\_  
KYLEE M. KANEALEY  
ATTORNEYS FOR RESPONDENT

September 22, 2025.

I support the finding of good cause.

By: \_\_\_\_\_

A handwritten signature in blue ink, appearing to read 'Donald J. Zelenka', is written over a horizontal line. The signature is stylized and extends to the right of the line.

DONALD J. ZELENKA  
Deputy Attorney General

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**PROOF OF SERVICE**

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The undersigned certifies that pursuant to Rule 262(c)(3), SCACR and the Supreme Court order of April 24, 2024, the Motion for Extension of Time to Serve and File the Initial Brief of Respondent and Designation of Matter, along with Certificate of Service has been forwarded to Appellant's counsel, Wanda H. Carter, Esquire via email today, September 22, 2025 to [WCarter@sccid.sc.gov](mailto:WCarter@sccid.sc.gov) and to her assistant Scott Leverett at [SLeverette@sccid.sc.gov](mailto:SLeverette@sccid.sc.gov).

I further certify that all parties required by Rule to be served have been served. This is the 22<sup>nd</sup> day of September, 2025.

*s/ Angela Brown*  
Administrative Coordinator

## Angela Brown

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**From:** Angela Brown  
**Sent:** Monday, September 22, 2025 2:16 PM  
**To:** Carter, Wanda; Leverett, Scott  
**Cc:** Kylee Kanealey; Melody Brown  
**Subject:** The State v. Tyriese Robinson (2024-000963) 3rd Request  
**Attachments:** Robinson.3rd Motion for Extension .pdf

Ms. Carter, please find attached the state's motion for an extension of time to serve and file the Initial Brief of Respondent and Designation of Matter in the above referenced appeal. The motion will be electronically filed with the South Carolina Court of Appeals on today's date.

Thank you,

**Angela Bennett Brown, Administrative Coordinator II**  
Office of the South Carolina Attorney General  
Criminal Division | Office [803-734-0368](tel:803-734-0368) | [Abennett@scag.gov](mailto:Abennett@scag.gov)  
P.O. Box 11549 | Columbia, SC 29211



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