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Sep 29 2025

SC Court of Appeals

STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Richland County
The Honorable Daniel Coble, Circuit Court Judge

THE STATE,

Respondent,

v.

TROY CHRISTOPHER STEVENSON, JR.,

Appellant.

Appellate Case No. 2024-000890

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

Respondent's Initial Brief and Designation of Matter is due today, Monday, September 29, 2025; however, due to counsel's heavy case load, she has been unable to complete the briefing for filing with this Court. Therefore, counsel would respectfully request a thirty (30) day extension in which to serve and file the initial brief and designation of matter in the captioned case. Opposing counsel was contacted prior to the filing of this motion but Respondent has not yet received a response to include in this filing. In support of this motion, counsel would respectfully show the Court the following:

1. Counsel has had a number of state and federal matters to attend in the last thirty days, including an argument in our Supreme Court, the filing of another brief in this Court and filings in the federal district court. Specifically, counsel prepared for and presented oral argument before the South Carolina Supreme Court in a murder direct appeal (*Kenneth H. Eastwood, September 23, 2025*); prepared and filed the Initial Brief of Respondent and Designation of Matter in another

murder direct appeal (*Melshaun Antwan Robinson, September 26, 2025*); prepared and filed the Return and Memorandum of Law in Support of Summary Judgment and Motion for Summary Judgment in a federal habeas corpus action (*Korey Love, September 5, 2025*); and prepared and filed two responses in another federal habeas corpus action (*Levern McCrea a/k/a Leverne McCream September 22, 2025*). Counsel has additionally completed the following circuit court work: edited and filed four state post-conviction relief action returns (*Natasha Booker, September 15, 2025; Eleki Jefferson September 15, 2025; Noelle Bailey, September 16, 2025; Sandra Yingst, September 17, 2025*); prepared and submitted final orders in three other post-conviction relief actions (*Elliot Hatton, September 15, 2025; William Newton September 15, 2025; Comest Allen, September 18, 2025*); edited and filed another return with a motion to dismiss in a separate post-conviction relief action (*Adrian Dodd, September 17, 2025*); prepared and submitted a proposed order of dismissal in another post-conviction relief action (*Robert D. Smith, Jr., September 17, 2025*); and, assisted with the drafting of and submitted a post-hearing brief in another post-conviction relief action (*Kent Washington, September 22, 2025*).

2. Counsel seeks an additional extension not for simply delay, but in light of the heavy case load as listed above. Counsel is cognizant of the time in extensions and will work to ensure that the briefing is completed within the time requested in this motion.

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
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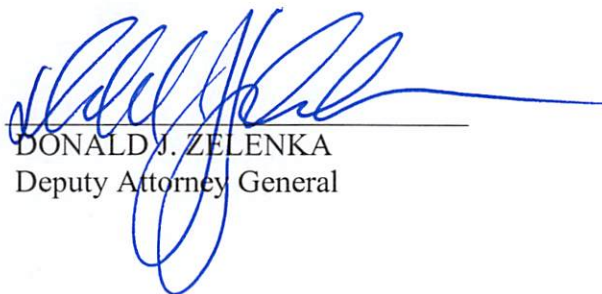
By: s/Kaylee C. Kemp
Kaylee C. Kemp
Assistant Attorney General
ATTORNEYS FOR RESPONDENT

September 29, 2025

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

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PROOF OF SERVICE

The undersigned certifies that pursuant to Rule 262(c)(3), SCACR and the Supreme Court order April 24, 2024, the Fourth Extension of Time to file the Initial Brief and Designation of Matter have been forwarded to Appellant's counsel, C. Rauch Wise, via email today, September 29, 2025, at rauchwise@gmail.com.

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

This is the 29th day of September 2025.

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