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Oct 13 2025

SC Court of Appeals

STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Hampton County
The Honorable Robert J. Bonds, Circuit Court Judge

THE STATE,

Respondent,

v.

TYRASE AKIL COLLINS,

Appellant.

Appellate Case No. 2024-001238

**MOTION FOR THIRD 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 October 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, Monday, October 13, 2025, as per this Court's Order granting Respondent's second extension request. The undersigned attorney for the Respondent has had a number of state and federal matters to attend to since September 2025. Specifically,

1. Counsel prepared and presented Oral Argument September 10, 2025, in the matter of The State v. Marvin Donte Bryan, Appellate Case No. 2017-001468, a matter pending in this Court;

2. Counsel filed the Final Brief of Respondent on September 11, 2025, in the matter of The State v. Karseem Nicholas Hardaway, Appellate Case No. 2024-001245, a matter 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 September 17, 2025 in the matter of Christopher Marquavious Moore, 368837 v. Warden, Perry Correctional Institution, C/A No. 4:25-cv-03534-DCC-TER, a matter pending in the District Court;
4. Counsel filed the Final Brief of Respondent on September 17, 2025, in the matter of The State v. Justin Cole Carroll, Appellate Case No. 2024-000722, a matter pending in this Court;
5. Counsel filed a Motion Opposing Petitioner's Motion to Amend Conditions of Bond on September 18, 2025, in the matter of K.C. Langford v. Donnie Stonebreaker, Jr., Warden, Evans Correctional Institution, C/A No. 9:20-cv-01298-DCC, a matter pending The United States Court of Appeals, Fourth Circuit;
6. Pursuant to Text Order [ECF 88] from the Honorable Donald C. Coggins, Counsel filed a Supplemental Brief on October 2, 2025, in the matter of K.C. Langford v. Donnie Stonebreaker, Jr., Warden, Evans Correctional Institution, C/A No. 9:20-cv-01298-DCC, a matter pending in The United States Court of Appeals, Fourth Circuit;
7. Counsel is preparing for a hearing regarding amending the conditions of bond, before the Honorable Donald C. Coggins on October 15, 2025, in the matter of K.C. Langford v. Donnie Stonebreaker, Jr., Warden, Evans Correctional Institution, C/A No. 9:20-cv-01298-DCC, a matter pending in The United States Court of Appeals, Fourth Circuit;
8. 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.
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ATTORNEY FOR RESPONDENT

October 13, 2025

[signature page continues next page]

I support the finding of good cause.

By: 

MELODY J. BROWN
Senior Assistant Deputy Attorney General

October 13, 2025

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PROOF OF SERVICE

I, Tommy Evans, Jr., certifies that pursuant to Rule 262(c)(3), SCACR and the Supreme Court order of April 24, 2024, the third extension to file the Initial Brief of Respondent, Designation of Matter and Proof of Service have been forwarded to Appellant's counsel, Gary H. Johnson via email today, October 13, 2025 to ghjohnson@sccid.sc.gov and to Mr. Johnson's assistant, Daniel Bast, to dbast@sccid.sc.gov.

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

This is the 13th day of October 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: Monday, October 13, 2025 2:28 PM
To: ghjohnson@sccid.sc.gov
Cc: Tommy Evans, Jr.; dbast@sccid.sc.gov
Subject: The State v. Tyrase Akil Collins - Third Motion for Extension to file Initial Brief of Respondent & Designation of Matter
Attachments: COLLINS, Tyrase - _MOTION FOR THIRD EXTENSION OF TIME TO FILE INITIAL BRIE_002.pdf

Dear Mr. Johnson,

Please find attached the Respondent's Third Motion for Extension to file the Initial Brief & Designation of Matter. This motion will be filed with the SC Court of Appeals today, October 13, 2025, along with a copy of this email. Thank you!

Sincerely,

Brandy Rankin

Brandy Rankin, Legal Assistant to Tommy Evans, Jr.
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