

**RECEIVED**

**Oct 17 2025**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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Appeal from Greenwood County  
The Honorable Donald B. Hocker, Circuit Court Judge

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THE STATE,

Respondent,

v.

WILLIAM GRAY ACKERMAN,

Appellant.

Appellate Case No. 2024-001749

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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 November 17, 2025, in which to serve and file the Initial Brief of Respondent and Designation of Matter in the above-referenced case. Undersigned counsel has reached out to opposing counsel for consent; however, undersigned has not yet received a response. In support of this motion, counsel would respectfully show the Court the following:

Respondent's Initial Brief and Designation of matter are due today, October 17, 2025. Pursuant to this Court's Order dated September 18, 2025. Counsel for Respondent has not been able to complete the initial brief within the allotted time due to other state and federal matters, including addressing matters in several *capital cases* in various stages of litigation, that have required counsel's attention. Specifically, since September 18, 2025, counsel has: completed and

filed a return to petition for writ of certiorari in a post-conviction relief appeal (*Clyde Davis, Sept. 22, 2025*); prepared for and presented argument in a murder direct appeal pending in the Supreme Court (*Kierin Dennis, Sept. 24, 2025*); prepared and filed an update to original jurisdiction response (*Anthony Simpson, Sept. 25, 2025*); completed with co-counsel the return and motion for summary judgment in a federal habeas corpus action (*Jerome Campbell, Sept. 26, 2025*); prepared and filed a return and motion to dismiss in another federal habeas corpus action (*Sandra Constantine, Sept. 29, 2025*); completed and filed a final brief of respondent in a murder direct appeal (*Ryan Manigo, Oct. 1, 2025*); prepared submissions to independent expert for a competency evaluation in a capital federal habeas action, and consulted for a joint status report (*James Robertson, Oct. 7, 2025*); prepared a presentation on recent appellate decisions for and attended a portion of the Solicitor's Conference (*Oct. 5-7, 2025*); consulted, revised and edited an initial brief of respondent (*Stacey M. Catoe, Oct. 10, 2025*); reviewed proposed record on appeal and consulted on transportation motions on a murder direct appeal (*Richard Alexander Murdaugh, Oct. 10, 2025*); prepared and presented argument in the Horry County Courthouse in Conway, S.C., in a capital post-conviction relief action re: applicant's Rule 59 motion (*Louis Winkler, Oct. 13, 2025*); prepared and filed a letter with our Supreme Court re: exhaustion of remedies in a capital case (*Stephen Corey Bryant, Oct. 14, 2025*); prepared for and participated in a status WebEx conference in a capital post-conviction relief action (*Timothy Jones, Oct. 16, 2025*); prepared and filed a return opposing a motion to stay the issuance of an execution notice (*Stephen Corey Bryant, Oct. 16, 2025*); received a notice of execution and sent out preparation and information notices regarding same (*Stephen Corey Bryant, Oct. 17, 2025*). Further, counsel is presently drafting a return and motion for summary judgment in another federal habeas action due to be filed Monday, Oct. 20, 2025 (*Adonis Williams*).

Due to counsel's involvement in these and other matters pending in state and federal court, and considering counsel's administrative responsibilities as supervisor for murder appeals, federal habeas corpus actions, and capital litigation, undersigned counsel has been unable to timely complete the brief in this direct appeal. However, counsel has associated another attorney in the section (AAG Joe Maye) to also work on the brief, and to further aid in the completion of the response brief. This is especially helpful given that the State has now received notice of a November 14, 2025 execution date in a matter which the undersigned has primary litigation responsibility (*Stephen Corey Bryant*).

For all the above reasons, Respondent is requesting a thirty (30) day extension of time in which to complete briefing in the captioned murder direct appeal.

This request is made in good faith, and not for the purpose of simple delay. Counsel is aware that this is a third extension in this matter and is working to clear other matters to complete the necessary review and return in this case without further delay.

Respectfully Submitted,

ALAN WILSON  
Attorney General

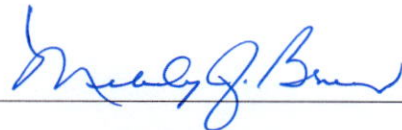
DONALD J. ZELENKA  
Deputy Attorney General

MELODY J. BROWN  
Senior Assistant Deputy Attorney General

W. JOSEPH MAYE  
Assistant Attorney General

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Columbia, South Carolina 29211  
(803) 734-6305

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



MELODY J. BROWN  
ATTORNEYS FOR RESPONDENT

October 17, 2025.

I support the finding of good cause.

By: \_\_\_\_\_  
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, Elizabeth Franklin-Best, Esquire via email today, October 17, 2025 to [elizabeth@franklinbeslaw.com](mailto:elizabeth@franklinbeslaw.com).

I further certify that all parties required by Rule to be served have been served. This is the 17<sup>th</sup> day of October, 2025.

*s/ Angela Brown*  
Administrative Coordinator

## Angela Brown

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**From:** Angela Brown  
**Sent:** Friday, October 17, 2025 5:07 PM  
**To:** elizabeth@franklinbestlaw.com  
**Cc:** Melody Brown  
**Subject:** The State v. William Gary Ackerman (2024-001749)  
**Attachments:** Ackerman.pdf

Ms. Franklin-Best, 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 for 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)  
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