

**RECEIVED**

**Nov 12 2025**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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

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THE STATE,

Respondent,

v.

TYRASE AKIL COLLINS,

Appellant.

Appellate Case No. 2024-001238

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

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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 November 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, Wednesday, November 12, 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 October 2025. Specifically,

1. Counsel is prepared and participated in 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;

2. Counsel prepared and participated in a virtual Status Conference before the Honorable Robert E. Hood on October 15, 2025, in the capital Post-Conviction Relief matter of Timothy Ray Jones, #5389 v. State of South Carolina, C/A 2024-CP-32-1212;

3. Counsel prepared and presented Oral Argument on October 21, 2025, in Richmond, Virginia before The United States Court of Appeals, Fourth Circuit in the matter of K.C. Langford v. Donnie Stonebreaker, Jr., Warden, Evans Correctional Institution, C/A No. 9:20-cv-01298-DCC;

4. Counsel prepared and filed the Final Brief of Respondent on October 27, 2025, in the matter of The State v. Calvin D. Ford, Appellate Case No. 2024-001870, a matter pending in this Court;

5. Counsel prepared for and presented Oral Argument to The South Carolina Court of Appeals on November 4, 2025 in the matter of The State v. Gabriel Dantray Curry, Appellate Case No. 2022-000966;

6. Counsel has prepared for and will present Oral Argument to The South Carolina Court of Appeals today, November 12, 2025, in the matter of The State v. Genari Gresean McNeil, Appellate Case No. 2023-000591;

7. Counsel is working on the Initial Brief and Designation of Matter due November 14, 2025, in the case of The State v. Jeffrey Michael George, Appellate Case No. 2024-001653 and which is on Fourth Extension and for which no further extensions are available, this is a matter pending in this Court;

8. Counsel is working on the Return and Memorandum of Law in Support of Motion for

Warden, Lieber Correctional Institution, C/A No. 0:25-cv-5626-RMJ-PJG, a matter pending in the District Court;

9. 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.  
TOMMY EVANS, JR.  
No. 7448  
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Post Office Box 11549  
Columbia, South Carolina 29211  
(803) 734-6305

ATTORNEY FOR RESPONDENT

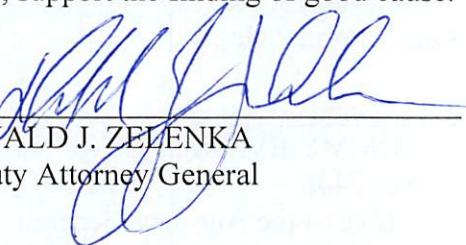
November 12, 2025

*[signature page continues next page]*

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

November 12, 2025

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**PROOF OF SERVICE**

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I, Tommy Evans, Jr., certifies that pursuant to Rule 262(c)(3), SCACR and the Supreme Court order of April 24, 2024, the fourth 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, November 12, 2025 to [ghjohnson@sccid.sc.gov](mailto:ghjohnson@sccid.sc.gov) and to Mr. Johnson's assistant, Daniel Bast, to [dbast@sccid.sc.gov](mailto:dbast@sccid.sc.gov).

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

This is the 12<sup>th</sup> day of November 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

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**From:** Brandy Rankin  
**Sent:** Wednesday, November 12, 2025 10:00 AM  
**To:** Johnson, Gary  
**Cc:** Tommy Evans, Jr.; dbast@sccid.sc.gov  
**Subject:** The State v. Tyrase Akil Collins - Fourth Motion for Extension to file Initial Brief of Respondent & Designation of Matter - Appellate Case No. 2024-001238  
**Attachments:** COLLINS - FOURTH EXT to FILE IBOR.pdf

Dear Mr. Johnson,

Please find attached the Respondent's Fourth Motion for Extension to file the Initial Brief and Designation of matter in the above-captioned case. This Motion will be filed today, November 12, 2025 with the South Carolina Court of Appeals along with a copy of this email. Thank you.

Sincerely

*Brandy Rankin*

Brandy Rankin, Legal Assistant to Tommy Evans, Jr.  
Office of the Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29211  
803-734-6305



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