

**RECEIVED**

**Nov 17 2025**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

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

---

THE STATE,

Respondent,

v.

WILLIAM GRAY ACKERMAN,

Appellant.

Appellate Case No. 2024-001749

---

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

---

Undersigned counsel would respectfully request a thirty (30) day extension up to and including December 17, 2025, in which to serve and file the Initial Brief of Respondent and Designation of Matter in the above-referenced case. Opposing counsel had graciously consent to this request. In support of this motion, counsel would respectfully show the Court the following:

Respondent's Initial Brief and Designation of matter are due today, November 17, 2025. Pursuant to this Court's Order dated October 20, 2025. Substantial work for the response has been completed, however, 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 October 20, 2025, counsel has: prepared and filed a return and motion for summary judgment in a federal habeas corpus action (*Adonis Williams, Oct. 20, 2025*); completed review of final brief of respondent for filing in a non-capital murder direct appeal pending in this Court (*Willie James Smith, Oct. 21, 2025*); prepared, circulated, then submitted a proposed order for disclosure of mental health records in a capital PCR action (*Timothy Jones, Oct. 22, 2025*); prepared and filed a status report in a non-capital federal habeas corpus action (*Henry Dukes, Oct. 23, 2025*); completed and filed an initial brief of respondent and designation of matter in another murder direct appeal (*Javeris Williams, Oct. 27, 2025*); prepared and filed three post-conviction relief action returns (*Jack Foreman, III and Jack Foreman, IV, Oct. 23, 2025; and David Barajas (SGJ), Oct. 28, 2025*); interviewed witness and prepared for post-conviction relief hearing scheduled for term beginning *Nov. 3, 2025, (David Barajas)*; completed with co-counsel an initial brief of respondent in another non-capital murder direct appeal (*Troy Stevenson, Oct. 29, 2025*); prepared and filed an expedited response to a petition for writ of habeas corpus in the original jurisdiction of the Supreme Court of South Carolina and a motion to stay execution (*Stephen Corey Bryant, Nov. 5, 2025*); prepared a memorandum of law for an *Aiken v. Byars* proceeding (*Brett Hollis, Nov. 12, 2025*); prepared and filed a motion to amend initial brief of respondent in one of the above mentioned initial briefs (*Javaris Williams, Nov. 13, 2025*); drafted other matters and participated in necessary communications in anticipation of the recent execution (*Stephen Corey Bryant, Nov. 14, 2025*); and completed and filed a reply to response opposing summary judgment in a non-capital federal habeas corpus action (*Jerome Campbell, Nov. 17, 2025*).

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. Mr. Maye has also had a number of state and federal matters that prevented him from completing the brief. Specifically, in addition to completing substantial work for the brief in this case, Mr. May also filed a Response in Opposition to Rule 59(e) Motion in a federal habeas corpus action (*Arthur Jones, October 20, 2025*); prepared and filed a Return to Petition for Writ of Certiorari in a murder direct appeal (*Ray Kelly, November 3, 2025*); and prepared and filed a final brief of respondent in another murder direct appeal (*Kemontee Blocker, November 5, 2025*).

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, though, having completed substantial work, does not expect any further delay in the filing.

Respectfully Submitted,

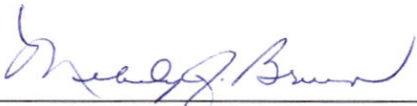
ALAN WILSON  
Attorney General

DONALD J. ZELENKA  
Deputy Attorney General

MELODY J. BROWN  
Senior Assistant Deputy Attorney General

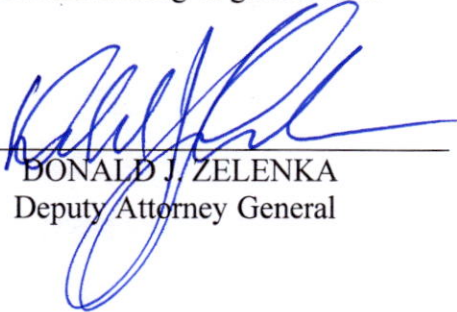
W. JOSEPH MAYE  
Assistant Attorney General

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

By:   
MELODY J. BROWN  
ATTORNEYS FOR RESPONDENT

November 17, 2025.

I support the finding of good cause.

By:   
DONALD J. ZELENKA  
Deputy Attorney General

**RECEIVED**

**Nov 17 2025**

**SC Court of Appeals**

State of South Carolina  
In the Court of Appeals

---

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

---

THE STATE,

Respondent,

v.

WILLIAM GRAY ACKERMAN,

Appellant.

Appellate Case No. 2024-001749

---

**PROOF OF SERVICE**

---

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, November 17, 2025 to [elizabeth@franklinbestlaw.com](mailto:elizabeth@franklinbestlaw.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 November, 2025.

*s/ Angela Brown*  
Administrative Coordinator

## Angela Brown

---

**From:** Angela Brown  
**Sent:** Monday, November 17, 2025 2:23 PM  
**To:** elizabeth@franklinbestlaw.com  
**Cc:** Melody Brown; Joe Maye; Brandy Rankin  
**Subject:** The State v. William Ackerman (2024-001749)  
**Attachments:** Ackerman.Motion for Extension of Time.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)  
P.O. Box 11549 | Columbia, SC 29211



*This email, together with any attachments, may be legally privileged. If you have received it in error, please notify the sender immediately, and then delete it from your system. This email and any replies to this email may be subject to disclosure under the Freedom of Information Act.*