

STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Sumter County
The Honorable R. Ferrell Cothran, Circuit Court Judge

RECEIVED
Jan 06 2026
SC Court of Appeals

THE STATE,

Respondent,

v.

MUSTAFA ABDUR SALAAM,

Appellant.

Appellate Case No. 2024-001620

**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 February 5, 2026, in which to serve and file the Initial Brief of Respondent and Designation of Matter in the above-referenced case. Opposing counsel has consented to all extension requests through February 1, 2026. In support of this motion, counsel would respectfully show the Court the following:

Respondent's Initial Brief and Designation of matter are due today, January 6, 2026, Pursuant to this Court's Order dated November 25, 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 November 25, 2025, counsel has: prepared and filed a return to petition for stay of execution and motion for appointment of counsel in federal district court in a capital case (*Marion Alexander Lindsay, Nov. 25, 2025*); prepared and filed a response in opposition to Rule 60(b) motion in a federal habeas corpus action (*Dupree Evans, Dec. 1, 2025*); prepared and filed a response in opposition to Rule 60(b) motion in another federal habeas corpus action (*Robbie Collins, Dec. 1, 2025*); prepared and filed a return to motion to amend/correction petition, and also a response opposing the appointment of counsel in another federal habeas corpus action (*Willie Williams, Dec. 1, 2025*); reviewed and edited for filing in this Court an initial brief of respondent in a murder direct appeal (*Christopher Longshore, Dec. 3, 2025*); reviewed and edited for filing in this Court another initial brief of respondent in a murder direct appeal (*Shamar Stanley, Dec. 4, 2025*); prepared and filed in the Supreme Court of South Carolina a return to petition for writ of certiorari (*Robert Dillard, Dec. 4, 2025*); prepared for two status conferences in a state capital PCR action (*Timothy Jones, Dec. 5 and 15, 2025*); edited, modified and filed a return and memorandum in support of motion for summary judgment in a federal habeas corpus action (*Tyrell Woods, Dec. 8, 2025*); prepared and filed a reply to response opposing summary judgment in a federal habeas corpus action (*Dennis Cumbee, Dec. 15, 2025*); reviewed and edited for filing in this Court an initial brief of respondent in a murder direct appeal (*Xabian Bailey, Dec. 15, 2025*); reviewed and edited for filing in this Court an initial brief of respondent in a murder direct appeal (*William Ackerman, Dec. 17, 2025*); prepared and filed a reply to response in opposition to summary judgment in another federal habeas corpus action (*Brittany Pearson, Dec. 18, 2025*); prepared and filed a reply to objections in another federal habeas corpus action (*Jerry Simpson, Dec. 19, 2025*); prepared for two status conferences in another state capital PCR action (*Luzinski Cottrell, Dec. 10, 2025 and Jan. 5, 2026*); completed

and filed in the Supreme Court of South Carolina a brief of respondent in a capital case PCR appeal (*Bayan Aleksey, Dec. 22, 2025*); reviewed and edited for filing a return to petition for writ of certiorari in a capital PCR action appeal regarding competency to be executed (*Steven Bixby, Dec. 23, 2025*); prepared and filed a status report in capital federal habeas corpus action (*Bobby Wayne Stone, Dec. 29, 2025*); prepared and filed a reply to a response opposing summary judgment in a federal habeas corpus action (*Tyrell Woods, Dec. 29, 2025*); edited and modified a return and memorandum in support of summary judgment in another federal habeas corpus action (*Mitchell Rivers, Jan. 5, 2025*); prepared and filed a response in opposition to motion for judgment on the pleadings, etc., in another federal habeas corpus action (*Vincent Missouri, Jan. 5, 2025*); and, prepared and filed a return and memorandum in support of summary judgment in another federal habeas corpus action (*Michael Braxton, Jan. 5, 2025*). Additionally, counsel is currently completing a final brief of respondent due to be filed in this Court today, (*Troy Stevenson, Jr.*), and continues to prepare for a capital PCR evidentiary hearing scheduled to begin on Jan. 12, 2026, in Conway, SC. (*Luzinski Cottrell*).

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 will be available for the final editing and assistance to ensure the filing is complete within the time requested. Counsel is working with another attorney in the office who prosecuted the case below, (ADAG Megan Raymer), to complete the brief. Ms. Raymer is doing the majority of the work for the briefing, but she, too, has an heavy caseload. Specifically, she has been assigned 14 new cases and has

been preparing for trial to be held in Spartanburg County the week of January 12, 2026 (*State v. Anthony Porter*).

For all the above work-related 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 fourth extension in this matter and will work to ensure that the brief is filed within the time requested.

Respectfully Submitted,

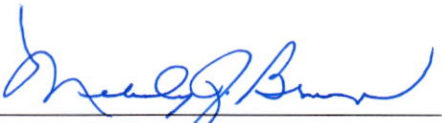
ALAN WILSON
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DONALD J. ZELENKA
Deputy Attorney General

MELODY J. BROWN
Senior Assistant Deputy Attorney General

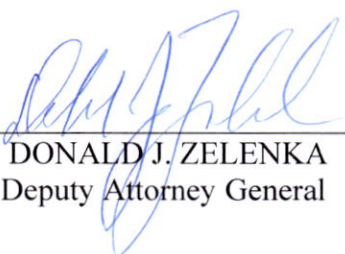
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By: 
MELODY J. BROWN
ATTORNEYS FOR RESPONDENT

January 6, 2026.

I 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 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, Jordan Wayburn, Esquire via email today, January 6, 2026 to Jwayburn@sccid.sc.gov and to his assistant at Cstock@sccid.sc.gov.

I further certify that all parties required by Rule to be served have been served. This is the 6th day of January, 2026.

s/ Angela Brown
Administrative Coordinator

Angela Brown

From: Angela Brown
Sent: Tuesday, January 6, 2026 5:06 PM
To: Wayburn, Jordan; Stock, Chris
Cc: Megan Raymer; Melody Brown
Subject: The State v. Mustafa Salaam (2024-001620)
Attachments: Salaam.Motion for Extension for IBOR.pdf

RECEIVED
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SC Court of Appeals

Counsel, 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 in reference to the above appeal. The motion will be electronically filed with the Court of Appeals on today's date.

Thank you,

Angela Bennett Brown, Administrative Coordinator II
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