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Mar 16 2026
SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Laurens County
Honorable Eugene C. Griffith, Jr., Circuit Court Judge
Appellate Case No. 2025-001933

THE STATE,

Appellant,

vs.

LEON LEE HARRIS, JR.,

Respondent.

MOTION FOR FOURTH EXTENSION OF TIME WITHIN WHICH TO SERVE AND FILE INITIAL BRIEF OF APPELLANT AND DESIGNATION OF MATTER

Appellant ("the State"), through its undersigned counsel, would respectfully show unto the Court as follows:

I.

The Initial Brief of Appellant and Designation of Matter are due to be served and filed on March 16, 2026.

II.

Pursuant to RE: Extension Requests in Criminal Direct Appeals and Post-Conviction Relief Certiorari Proceedings: Order of the South Carolina Supreme Court dated March 18, 2009, the State moves for a **fourth** extension in the above-referenced criminal appeal and asks for an additional thirty days to complete the brief in this case. In the last week, the undersigned counsel submitted an Initial Brief of Respondent and Designation of Matter to the Court of

Appeals in State v. Willis Terrel Ivey. Additionally, in the past few weeks, the undersigned counsel has submitted an Initial Brief of Respondent and Designation of Matter to the Court of Appeals in State v. John Bendarian Bonner; has submitted a Return to Petition for Writ of Certiorari to the Supreme Court in State v. Rodney David Riggins and State v. Randolph Ashford; has submitted a Motion to Dismiss in lieu of a Return to Petition for Writ of Certiorari to the Supreme Court in State v. Bryan Preston Cooper; has submitted a Final Brief of Respondent to the Court of Appeals in State v. Jason Connell Palmer and State v. Levy Ernest Dunn, III; and has submitted a letter in lieu of a formal return to the Appellant's various pro se filings at the request of the Court of Appeals in State v. Keyshon A. Poinsette, Jr.. Along with that, the undersigned counsel has attended to other responsibilities—including supervisory and administrative ones—in the office and has prepared materials for and presented at the 35th Annual Criminal Practice in South Carolina continuing legal education seminar on behalf of the South Carolina Bar Association.

III.

The undersigned counsel submits this extension request is supported by extraordinary circumstances and is not intended for purposes of delay. The Brief in the above-referenced case involves a challenge to a ruling suppressing evidence obtained as a result of a purportedly-unconstitutional search. The undersigned counsel is currently working on the Brief in this case and intends to have it finished in a timely manner. However, the undersigned counsel has not yet been able to finish the Brief due to a heavy workload and other issues that have required the undersigned counsel's attention. Accordingly, to ensure the Brief is properly researched and prepared, I would therefore request an additional extension of time within which to serve and file the Brief.

WHEREFORE, Appellant prays that the Court extend the deadline for the service and filing of the Initial Brief of Appellant and Designation of Matter in this case for thirty days from the date such relief is granted; hold the matter in abeyance pending a ruling on Appellant's motion; and grant such other and further relief as the Court may deem just and proper.

Respectfully submitted,

ALAN WILSON
Attorney General

MARK R. FARTHING
Senior Assistant Deputy Attorney General

By:_____
Mark R. Farthing
S.C. Bar Number 76901

I have reviewed and approved this extension request.

By:_____
Donald J. Zelenka
Deputy Attorney General

March 16, 2026

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THE STATE,

Appellant,

vs.

LEON LEE HARRIS, JR.,

Respondent.

PROOF OF SERVICE

I, Caroline Collins, certify I have served the within Motion for the Fourth Extension of Time Within Which to Serve and File Initial Brief of Appellant and Designation of Matter on Appellant by sending an electronic copy via email to the address listed in AIS for the following individual:

Alissa Leigh Wilson, Esquire
alissa@alissawilsonlaw.com

Adam Gabriel Touma
adam@toumalawgroup.com

I further certify all parties required by Rule to be served have been served.
This 16th day of March, 2026.

CAROLINE COLLINS
Administrative Support Manager
Office of the Attorney General