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SC Court of Appeals

ALAN WILSON
ATTORNEY GENERAL

September 10, 2026

The Honorable Jenny A. Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Re: The State v. Nayquan Unique Gadson
Appellate Case No: 2025-002033

Dear Ms. Kitchings:

The return to Appellant's Motion for an Order to Reconstruct the Record or for a New Trial is due to be filed today. After reviewing all the assertions in the motion, the undersigned counsel for the State will oppose the motion as presented. Undersigned counsel respectfully requests a short, four-day extension to complete a proper return.

The undersigned has been working on a return but has been unable to complete the draft due to a heavy case load, including, most notably: preparing for and attending a status hearing in a capital case (*Jones, Sept. 4*) preparing for and attending a circuit court hearing where a defendant has requested credit for time accrued while out of state custody on a federal appeal bond (*Langford, Sept. 9*); completed and filed the memorandum addressing appealability as directed by this Court (*Anderson, Sept. 8*); and, is currently preparing for a federal appellate court argument in a capital case (*Dickerson, Sept. 16*); and for a state evidentiary hearing in another capital case (*Inman, Sept. 21*). To adequately set out the reasons for the State's opposition to the motion, the undersigned respectfully requests this brief extension.

Sincerely,

s/ Melody J. Brown

Melody J. Brown
Senior Assistant Deputy Attorney General
S.C. Bar No: 14244

MJB

cc: Kersey A. Reynolds, Appellate Defender (via email only)