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Sep 25 2026

SC Court of Appeals

STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Horry County
The Honorable Benjamin H. Culbertson, Circuit Court Judge

THE STATE OF SOUTH CAROLINA,

Respondent,

v.

MEAGAN JACKSON,

Appellant.

Appellate Case No. 2024-002010

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

The undersigned counsel would respectfully request a thirty (30) day extension in which to serve and file the Initial Brief of Respondent and Designation of Matter in the above-referenced case. Opposing counsel has graciously consented to this extension request via email on September 24, 2026. In support of this motion, counsel would respectfully show the Court the following:

Respondent's Initial Brief and Designation of Matter is due today, September 25, 2026, as per this Court's Order granting Respondent's second extension request. The undersigned attorney for the Respondent has had a number of state and federal matters to attend to since August 2026 when the Court granted Respondent's second extension. Specifically:

1. Counsel prepared and filed the Petition for Writ of Certiorari, together with the Appendices on August 25, 2026, in the matter of The State v. Anijah Yarnell, Appellate Case No. 2023-000571, a matter pending in the South Carolina Supreme Court;

2. Counsel prepared and filed the Post Hearing Brief in the matter of Norman Edwin Starnes v. State of South Carolina, Case No. 2022-CP-32-830, on August 28, 2026, a capital Post-Conviction Relief matter;
3. Counsel prepared and filed the Response in Opposition to Petitioner's Rule 60(b) Motion on September 8, 2026, in the matter of Arthur Quentin Jones, Jr. v. Warden Evans Correctional Institution, C/A No.: 6:24-04191-JFA-KFM, a matter pending in the District Court;
4. Counsel prepared and filed the Final Brief of Respondent on September 10, 2026, in the matter of The State v. Keoki Kenta Harris, Appellate Case No. 2024-0001742, a matter pending in the South Carolina Court of Appeals;
5. Counsel prepared and filed the Response in Opposition to Petitioner's Rule 59(e) & 60(b) Motion on September 14, 2026, in the matter of Naijuwuan S. Chisolm v. Warden of Ridgeland Correctional Institution, C/A No.: 1:25-cv-11722-JD, a matter pending in the District Court;
6. Counsel prepared and presented Oral Argument on September 16, 2026, in the matter of The State v. Thomas E. McDowell, Appellate Case No. 2024-000226, a matter pending in the South Carolina Court of Appeals;
7. Counsel prepared and filed the Response in Opposition to Petition to Vacate Bond on September 21, 2026, in the matter of The State v. Anijah Yarnell, Appellate Case No. 2026-001715, a matter pending in the South Carolina Supreme Court;
8. Counsel filed the Respondent's Reply to Petitioner's Objections to the Order Denying

Appointment of Counsel on September 23, 2026, in the matter of Walter A. Palacios v. Brian Kendall, C/A No. 5:26-cv-2617-RMG-KDW, this is a matter pending in the District Court;

9. Counsel prepared and filed the Final Brief of Respondent on September 23, 2026, in the matter of The State v. Brandon Lee Corder, Appellate Case No. 2023-001543, this is a matter pending in the South Carolina Court of Appeals;

10. Counsel was just reassigned this case on September 4, 2026, as the original attorney accepted employment outside of the South Carolina Attorney General's Office.

11. 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 of Respondent and Designation of Matter.

Respectfully Submitted,

ALAN WILSON
Attorney General

DONALD J. ZELENKA
Deputy Attorney General

MELODY J. BROWN
Senior Assistant Deputy Attorney General
S.C. Bar No: 14244

W. JOSEPH MAYE
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[signature page continued next page]

September 24, 2026

By: s/W. Joseph Maye
W. Joseph Maye
Assistant Attorney General
ATTORNEYS FOR RESPONDENT

I support the finding of good cause.

By: 

MELODY J. BROWN
Senior Assistant 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 April 24, 2024, the Third Extension of Time to file the Initial Brief of Respondent and the Designation of Matter have been forwarded to Appellant's counsel, Lacey Thompson, Esquire, via email today, September 25, 2026, to ltompson@grandstrandlaw.com.

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

This is the 25th day of September 2026.

s/W. Joseph Maye
W. Joseph Maye
Assistant Attorney General

Sep 25 2026

Brandy Rankin

SC Court of Appeals

From: Brandy Rankin
Sent: Friday, September 25, 2026 9:59 AM
To: lthompson@grandstrandlaw.com
Cc: Joe Maye
Subject: Third Motion for Extension to file the Respondent's Initial Brief & Designation of Matter - The State of South Carolina v. Meagan Jackson - Appellate Case No. 2024-002010
Attachments: THIRD EXTENSION - Jackson, Meagan.pdf

Dear Ms. Thompson,

Please find attached the Respondent's Third Motion for Extension to file the Initial Brief and Designation of Matter together with the Proof of Service in the above-captioned case. These documents will be filed with the South Carolina Court of Appeals today, September 25, 2026, along with a copy of this email. Thank you.

Sincerely,

Brandy Rankin

Brandy Rankin, Legal Assistant to W. Joseph Maye
Office of the Attorney General
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803-734-6305



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