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Oct 26 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 FOURTH 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 was contacted this morning for consent, but we have not heard back as of 3:45 pm. In support of this motion, counsel would respectfully show the Court the following:

Respondent's Initial Brief and Designation of Matter is due today, October 26, 2026, as per this Court's Order granting Respondent's third extension request. The undersigned attorney for the Respondent has had a number of state and federal matters to attend to since September 2026 when the Court granted Respondent's third extension. Specifically:

1. Counsel prepared and filed the Reply to Petitioner's Response in Opposition to Motion for

Summary Judgment on September 25, 2026, in the matter of Robert Lee McCord v. Warden Jonathan Nance, C/A No. 9:26-cv-00419-JD-MHC, a matter pending in the District Court;

2. Counsel prepared and filed the Reply to Response in Opposition on October 1, 2026, in the matter of Jquan Scott, #365229 v. Warden, Broad River Correctional Institution, C/A No. 4:25-cv-13549-DCN-TER, a matter pending in the District Court;
3. Counsel prepared and filed the Response in Opposition to Petitioner's Rule 59(e) Motion on October 1, 2026, in the matter of Chris Anthony Liverman v. South Carolina Department of Corrections, Warden of Tallahatchie County Correctional Facility, C/A No. 9:23-03205-JD, a matter pending in the District Court;
4. Pursuant to the request of the Honorable Donald B. Hocker, counsel prepared the Respondent's Sur-Reply Brief on October 2, 2026, in the capital Post-Conviction Relief matter Norman Edwin Starnes, #5053 v. State of South Carolina, C/A No. 2022-CP-32-00830;
5. Counsel took pre-planned personal leave from October 5, 2026, through October 16, 2026;
6. Counsel will be working and preparing for a Status Conference to be held on October 27, 2026, in the capital matter of Abidiyyah Ben Alkebulanyahh a/k/a Tyree Roberts, #6012 v. State of South Carolina, Appellate Case No. 2019-000529;
7. Counsel is working on the Initial Brief of Respondent and Designation of Matter due

October 30, 2026, and for which there are no further extensions available, in the matter of The State v Cleveland Stone, Jr., Appellate Case No. 2024-002010, a matter pending in the South Carolina Court of Appeals;

8. 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

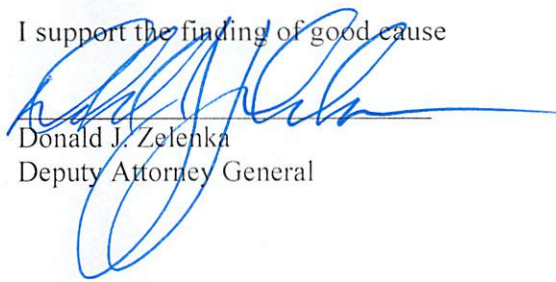
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By: s/ W. Joseph Maye
W. Joseph Maye
Assistant Attorney General

ATTORNEYS FOR RESPONDENT

[signature page continued next page]

I support the finding of good cause

A handwritten signature in blue ink, appearing to read 'Donald J. Zelenka', is written over the text 'I support the finding of good cause' and the printed name 'Donald J. Zelenka'.

Donald J. Zelenka
Deputy Attorney General

October 26, 2026

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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 Fourth 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, October 26, 2026, to ltompson@grandstrandlaw.com.

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

This is the 26th day of October 2026.

s/W Joseph Maye

W. Joseph Maye
Assistant Attorney General

Brandy Rankin

From: Brandy Rankin
Sent: Monday, October 26, 2026 4:06 PM
To: lthompson@grandstrandlaw.com
Cc: Delany, Joanna
Subject: The State of South Carolina v. Meagan Jackson - Fourth Motion for Extension to file Initial Brief of Respondent & Designation of Matter - Appellate Case No 2024-002010
Attachments: Fourth Extension to file Initial Brief of Respondent & Designati.pdf

Dear Ms. Thompson,

Please find attached the Respondent's Fourth Motion for Extension to file the Initial Brief and Designation of Matter together with the Proof of Service. These documents will be filed with the South Carolina Court of Appeals today, October 26, 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
Post Office Box 11549
Columbia, South Carolina 29211
803-734-6305

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SC Court of Appeals



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