

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Horry County
Steven H. John, Circuit Court Judge

THE STATE,

Respondent,

v.

KAREEM S. HARRY,

Appellant.

RECEIVED

MAR 20 2014

Appellate Case No. 2013-000336

SC Court of Appeals

MOTION TO ENLARGE TIME FOR
FILING INITIAL BRIEF OF RESPONDENT AND
DESIGNATION OF MATTER

The Respondent, above-named, by and through the undersigned attorneys, would respectfully move this Court for a 30-day extension of time within which to file its Initial Brief of Respondent from March 20, 2014 up to and including April 21, 2014. Counsel for Respondent has not been able to complete the Initial Brief within the allotted time for the following reasons:

1. Counsel for Respondent has been involved in a number of other state and federal matters, that include:

(A) Mikal Mahdi v. State (Capital PCR) draft of Amended Order denying relief for the Circuit Court (Judge Doyet Early), submitted Thursday, February 27, 2014. (Approximately 125 pages);

RIB 2nd

(B) Goins v. Warden (Federal Habeas Appeal) Brief of Respondent **filed in the 4th Circuit Court of Appeals in Richmond on January 27, 2014;**

(C) State v. Marshall Fullbright (Murder X 2, Armed Robbery X 2)(Initial Brief of Respondent) **filed in the S.C. Court of Appeals, February 3, 2014;**

(D) Phillip Sims v. Warden (Federal Habeas Return) **filed February 10, 2014 in U.S. District Court for the District of South Carolina;**

(E) Rico Hickman v. Warden (Federal Habeas Return) **filed February 20, 2014 in U.S. District Court;**

(F) State v. Bruce Hill (Murder X 2, Burglary 1st) Oral Argument before the S.C. Supreme Court **on February 5, 2014;**

(G) Albert Harris v. Warden (Federal Habeas Return)(Burglary 1st, Armed Robbery, Involuntary Manslaughter) **filed Friday, March 13, 2014;**

(H) State v. Antonio Miller (Murder) Final Brief of Respondent **filed February 24, 2014 in the S.C. Court of Appeals;**

(I) Stephen Stanko v. State (Capital PCR) **Status Conference (February 21, 2014) before Circuit Judge Benjamin Culbertson in Conway, S.C. for scheduling order;**

(K) State v. Kenneth Lynch (Murder X 2, Grand Larceny)(Initial Brief of Respondent) **in process;**

(L) Gena Beatty v. State (Federal Habeas Return)(Felony DUI Death, Felony DUI Great Bodily Injury) **in process;**

(M) Freddie Owens v. State (Capital PCR Case)(Return to Petition for Certiorari in the S.C. Supreme Court) **in process;**

(N) Stephen Stanko v. State (Capital PCR) (Return to Final Amended Application), **due Monday and in process of completing;**

and, other matters;

For extraordinary circumstances shown, Respondent requests this Court grant it a thirty (30) day extension to file the Initial Brief of Respondent in this matter. This is Respondent's 2nd extension request.

Respectfully submitted,

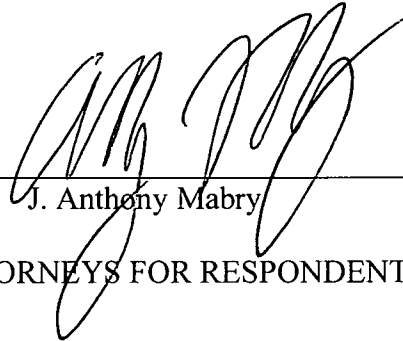
ALAN WILSON
Attorney General

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J. ANTHONY MABRY
Assistant Attorney General
Post Office Box 11549
Columbia, SC 29211
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By:



A handwritten signature in black ink, appearing to read 'J. Mabry', is written over a horizontal line. The signature is stylized and cursive.

J. Anthony Mabry

ATTORNEYS FOR RESPONDENT

March 20, 2014.

CERTIFICATE OF SERVICE

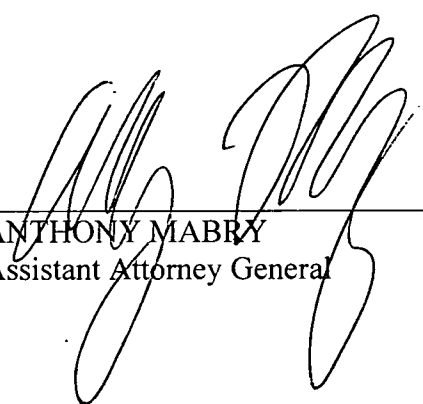
I, **Anthony Mabry**, hereby certify that I have served the Motion to enlarge Time for Filing Initial Brief of Respondent and Designation of Matter in the foregoing action by depositing copy in the United States Mail to :

Meliah Bowers Jefferson, Esquire
WYCHE, P.A.
44 East Camperdown Way
Greenville, SC 29601

And by InterAgency Mail to:

Robert M. Dudek
Chief Attorney
Division of Appellate Defense
1330 Lady, Street, Ste. 401
Columbia, SC 29201

This 20th day of March, 2014.



ANTHONY MABRY
Assistant Attorney General



ALAN WILSON
ATTORNEY GENERAL

March 20, 2014

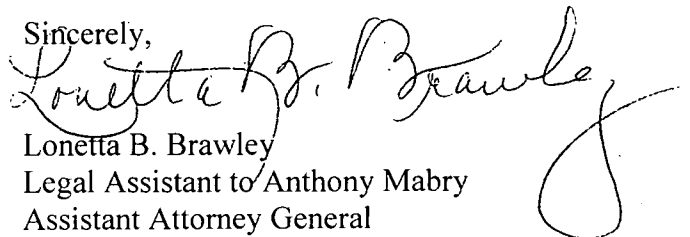
Honorable Jenny A. Kitchings
Clerk, South Carolina Court of Appeals
P. O. Box 11629
Columbia, SC 29211

Re: State v. Kareem S. Harry
Appellate Case No. 2013-000336

Dear Ms. Kitchings:

Enclosed please find a Motion to Enlarge Time for Filing Initial Brief of Respondent in the above-referenced case for filing. By copy of this letter, I am serving opposing counsel with same.

Sincerely,



Lonetta B. Brawley
Legal Assistant to Anthony Mabry
Assistant Attorney General

/lbb
Enclosure

cc: Meliah Bowers Jefferson, Esquire
Robert M. Dudek, Esquire

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