

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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APR 18 2014

SC Court of Appeals

Appeal from Beaufort County

The Honorable D. Craig Brown, Circuit Court Judge

THE STATE,

RESPONDENT,

v.

RAJERICK L. KNIGHT,

APPELLANT,

Appellate Case No.: 2012-213529.

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

Respondent, the State, moves this Court for an additional thirty (30) day extension of time in which to file the Initial Brief of Respondent and Designation of Matter due to be filed on April 21, 2014. This is Respondent's second request for an extension of time in which to file the brief. In support of the request, undersigned counsel would respectfully show the Court:

1. Undersigned counsel for Respondent has been scheduled for a number of state and federal matters in the last thirty (30) days, that include, but are not limited to, the following: prepared and filed a return and memorandum of law in support of motion for summary judgment in another federal habeas action (*Shante Daniels*); prepared and filed a motion to supplement the return in another federal habeas action (*Ricky Brannon*); and, prepared and filed with this Court an

Initial Brief of Respondent in another non-capital murder direct appeal (*Ron Santa McCray*). Counsel has also recently been appointed co-counsel in the capital death penalty post-conviction relief action of *Andres Antonio Torres* and has been in the merits hearing that began on April 14, 2014, in Spartanburg, SC. In preparation for the hearing, counsel traveled to Spartanburg, SC for exhibit review on April 9, 2014 and again on April 11, 2014 for additional hearing preparation, along with completing other actions and research to prepare for the evidentiary hearing. The hearing is scheduled to continue with expert testimony through the week of April 21, 2014. Further, Counsel also attended a status conference in another capital case in federal habeas (*Brad Sigmon*) in Greenville, SC on Thursday, April 17, 2014.

2. Due to her case load and, in particular, the substantial preparation needed for the capital case listed above, undersigned counsel for Respondent has not been able, in a timely fashion, to complete the initial brief in this appeal.

3. Counsel for Appellant, Katie Fowler Monoc, Esq., has no objection to this motion.

THEREFORE, undersigned counsel for Respondent respectfully requests an additional extension of thirty (30) days to complete the Initial Brief of Respondent and Designation of Matter.

Respectfully submitted,


ALAN WILSON
Attorney General

JOHN W. McINTOSH
Chief Deputy Attorney General

DONALD J. ZELENKA

Senior Assistant Deputy Attorney General

KAYCIE S. TIMMONS
Assistant Attorney General

BY: 
KAYCIE S. TIMMONS
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April 18, 2014.
Columbia, South Carolina.

ATTORNEYS FOR RESPONDENT

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Beaufort County

The Honorable D. Craig Brown, Circuit Court Judge

THE STATE,

RESPONDENT,

v.

RAJERICK L. KNIGHT,

APPELLANT,

Appellate Case No.: 2012-213529.

PROOF OF SERVICE

I, Kaycie S. Timmons, certify that I have served Respondent's Motion for a Second Extension of Time on counsel for Appellant, by depositing one copy of same in the United States mail, postage prepaid, to counsel for appellant, addressed as follows:

Katie Fowler Monoc, Esq.
Pratt-Thomas Walker, P.A.
Post Office Drawer 22247
Charleston, SC 29413-2247

Robert M. Dudek, Chief Appellate Defender
South Carolina Commission on Indigent Defense
Division of Appellate Defense
PO Box 11589
Columbia, SC 29211-1589

This 18th day of April, 2014.



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ATTORNEY FOR RESPONDENT



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ALAN WILSON
ATTORNEY GENERAL

April 18, 2014

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

Re: The State v. Rajerick L. Knight
Appeal from Beaufort County
Appellate Case No. 2012-213529

Dear Ms. Kitchings:

Enclosed please find the original and one (1) copy of Respondent's Motion for Second Extension of Time to file the Initial Brief of Respondent and Designation of Matter, dated today, together with a Proof of Service in the above-referenced matter.

Thank you for your assistance in this matter. Please call this office if you need any additional information.

Sincerely,

Kaycie S. Timmons
Assistant Attorney General

KST/mv

cc: Katie Fowler Monoc, Esq.
Robert M. Dudek, Chief Appellate Defender