

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

**RECEIVED**

MAY 05 2014

**SC Court of Appeals**

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Appeal from York County  
Honorable John C. Hayes, III, Circuit Court Judge  
Appellate Case Tracking No. 2014-000280

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The State,

Appellant,

vs.

William Russell Patterson,

Respondent.

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**MOTION FOR SECOND EXTENSION  
TO SERVE AND FILE INITIAL BRIEF OF APPELLANT  
AND DESIGNATION OF MATTER**

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Appellant, through its undersigned counsel, would respectfully show unto this Court as follows:

I.

The Initial Brief of Appellant and Designation of Matter are due to be served and filed May 5, 2014.

II.

Pursuant to RE: Extension Requests in Criminal Direct Appeals and Post-Conviction Relief Certiorari Proceedings: Order of the South Carolina Supreme Court dated March 18, 2009, the Respondent moves for a second extension in the above referenced appeal. Due to work required in other cases pending before this Court and the South Carolina Supreme Court, I am unable to complete this Brief on time. The undersigned has completed several initial briefs, Returns to Petition for Writ of

Certiorari, and Petitions for Writ of Certiorari in the last several weeks. In addition, counsel has participated in oral arguments at this Court and the South Carolina Supreme Court.

III.


This extension request is not intended for purposes of delay, but rather to ensure the Brief is properly researched and prepared. I would therefore request a second extension of time within which to serve and file the Initial Brief of Appellant and Designation of Matter.

WHEREFORE, Appellant prays that the Court hold this matter in abeyance until ruling on this motion, and extend the deadline for the service and filing of the Initial Brief of Appellant and Designation of Matter in this case for thirty (30) days from the date such relief is granted; and for such other and further relief as the Court may deem just and proper.

Respectfully submitted,

ALAN WILSON  
Attorney General

WILLIAM M. BLITCH, JR.  
Assistant Attorney General

BY:   
William M. Blitch, Jr.  
Office of the Attorney General  
Post Office Box 11549  
Columbia, SC 29211  
(803) 734-3727

ATTORNEYS FOR APPELLANT

May 5, 2014

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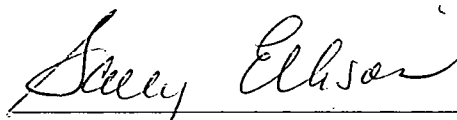
**PROOF OF SERVICE**

I, Sally Ellison, certify that I have served the Motion for Second Extension to Serve and File Initial Brief of Appellant and Designation of Matter on Respondent by depositing a copy of same in the United States mail, postage prepaid, addressed to:

Christopher A. Wellborn, Esquire  
142 Oakland Avenue, Suite C  
Rock Hill, South Carolina 29730

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

This 5<sup>th</sup> day of May, 2014.



SALLY ELLISON  
Office of Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29211  
(803) 734-3727



ALAN WILSON  
ATTORNEY GENERAL

May 5, 2014

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

Re: State v. William Russell Patterson  
Appellate Case Tracking No. 2014-000280

Dear Ms. Kitchings:

Enclosed please find the original and six (6) copies of a Motion for Second Extension to Serve and File Initial Brief of Appellant and Designation of Matter along with proof of service for filing in the above-referenced appeal.

Sincerely,

William M. Blich, Jr.  
Assistant Attorney General

Enclosures

cc: Christopher A. Wellborn, Esquire  
Victim Services

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