

**STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appeal from Richland County
The Honorable Clifton Newman, Circuit Court Judge

Appellate Case No. 2012-212387

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SC Court of Appeals

THE STATE,

Respondent,

vs.

AHMAD JAMAL WILKINS,

Appellant.

**MOTION FOR SECOND 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 file the Initial Brief of Respondent in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following:

Respondent's Initial Brief is due today, September 4, 2014, upon this Court's grant of Respondent's first request for an extension filed on August 13, 2014.

The undersigned attorney for the Respondent has had a number of state and federal matters to attend since August 4, 2014. Specifically,

1. Counsel prepared the Return and Memorandum of Law in Support of Motion for Summary Judgment in the matter of Rontell Singletary, #338278 vs. Warden Bush, C/A No. 8:14-1764-JMC-JDA on August 4, 2014;

2. Counsel prepared Respondent's Response to Text Order [Doc. #46] entered by Magistrate Judge Bristow Marchant in the matter of William A. Avinger, II, #319774 vs. The State of South Carolina, C/A 9:13-02736-BHH-BM on August 6, 2014;

3. Counsel prepared the Return and Memorandum of Law in Support of Motion for Summary Judgment in the matter of Jovan T. Brown, #272674 a/k/a Jovan Brown and Javon Brown vs. Joseph McFadden, Warden, C/A No. 8:14-1269-RBH-JDA on August 7, 2014;

4. Counsel prepared the Respondent's Response in Opposition to Petitioner's Motion for Judgment on the Pleadings [Doc. #23] in the matter of William Antonio Gleaton, #326282 vs. Warden Dennis Bush, C/A No. 4:14-890-TMC-TER on August 11, 2014;

5. Counsel prepared the Return and Memorandum of Law in Support of Motion for Summary Judgment in the matter of Steven Samuel, #318276 vs. Willie Eagleton, C/A No.: 2:14-666-TMC-WWD on August 12, 2014;

6. Counsel prepared the Final Brief of Respondent in the Greenville County murder appeal matter of The State vs. Nathaniel B. Beeks on August 13, 2014;

7. Counsel also prepared the Return to Petition for Writ of Certiorari in the Lancaster County murder appeal matter now pending before the South Carolina Supreme Court in The State vs. Anthony Rodriekus Carter on August 19, 2014;

8. Counsel prepared the Return and Memorandum of Law in Support of Motion for Summary Judgment in the matter of Todd M. Sowell, #238581 a/k/a Todd Michael Sowell vs. Joseph L. McFadden, C/A No.: 9:14-1008-JMC-BM on August 12, 2014;

9. Counsel prepared the Initial Brief of Respondent in the matter of The State vs. Lamont Antonio Samuel, an Orangeburg County murder appeal matter on September 2, 2014; and

10. Counsel prepared the Brief of Respondent by Respondent-Petitioner in the Cherokee County Capital Post-Conviction Relief Appeal matter of Jonathan Kyle Binney, #6009 vs. The State, today, September 4, 2014.

However, due to counsel's involvement in these and other matters pending in state and federal court, counsel is unable to timely complete the Initial Brief of Respondent in this proceeding. Thus, counsel is requesting an extension of time in which to file the Brief in this matter. This request is made in good faith, and not for the purposes of delay.

WHEREFORE, premises considered, counsel hereby 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

JOHN W. McINTOSH
Chief Deputy Attorney General

DONALD J. ZELENKA
Senior Assistant Deputy Attorney General
No. 4425

WILLIAM EDGAR SALTER, III
Senior Assistant Attorney General
No. 3710

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By: 
WILLIAM EDGAR SALTER, III

ATTORNEYS FOR RESPONDENT

September 4, 2014.

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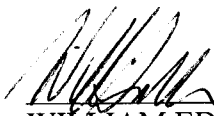
SC Court of Appeals

PROOF OF SERVICE

I, William E. Salter, III, of counsel for the Respondent, certify that I have served two (2) copies of the within motion for a second extension to file Initial Brief of Respondent and Designation of Matter via U.S. mail to his attorney of record, Susan Hackett, Esq., SCCID/Division of Appellate Defense, 1330 Lady Street, Suite #401, Columbia, South Carolina 29201-3332.

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

This 4th day of September, 2014.



WILLIAM EDGAR SALTER, III
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(803) 734-6305



ALAN WILSON
ATTORNEY GENERAL

September 4, 2014

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

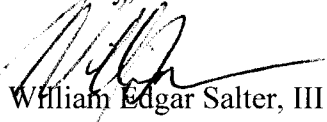
Re: *The State v. Ahmad Jamal Wilkins*
Appeal from Richland County
Appellate Case No. 2012-212387

Dear Ms. Kitchings:

I hereby request an extension of thirty (30) days in which to file the Initial Brief of Respondent and Designation of Matter in the above-referenced case. The Initial Brief is currently due to be served and filed today, September 4, 2014. However, because of my involvement in other matters in state and federal court, I have been unable to timely complete the Initial Brief.

Therefore, I am enclosing an original and six (6) copies of a Motion for Extension to File Initial Brief of Respondent and Designation of Matter. I am advising counsel for Appellant by copy of this letter.

Sincerely,



William Edgar Salter, III
Senior Assistant Attorney General

WES/dmd
Enclosures

cc: Susan B. Hackett, Esq. (w/two copies of encls.)

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SC Court of Appeals