

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Greenville County
Honorable Deadra L. Jefferson, Circuit Court Judge

THE STATE,

Respondent,

v.

WILLIE M. WILLIAMS,

Appellant.

Appellate Case No. 2013-001152.

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SEP 19 2014
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. The Initial Brief of Respondent is due to be filed September 19, 2014. The undersigned attorneys for the above Respondent move that the time for return be extended to October 20, 2014. This motion is made because Respondent has not been able to complete the Initial Brief within the allotted time for the following reasons:

1. Counsel has been unable to complete the Initial Brief because counsel for Respondent has been involved in a number of other state and federal matters, that include:

(A) Ashante Wright v. Warden (Murder) (Federal Habeas Return) **filed August 5, 2014 in United States District Court;**

(B) State v. Derringer Young (Murder)(Return to Petition for Certiorari to the Court

of Appeals, filed the week of August 4th-8th, 2014 in the S.C. Supreme Court;

(C) Bobby Gibson v. Warden (Federal Habeas Case) Motion hearing on Objections to the Report and Recommendation of the U.S. Magistrate held before U.S. District Judge Joseph Anderson on July 30, 2014;

(D) State v. Marcus Wright (Murder) (Initial Brief of Respondent) filed in this Court on August 27, 2014;

(E) Robert Laroche v. Warden (Federal Habeas Return) filed on or about August 12, 2014;

(F) Robert Laroche v. Warden (Federal Habeas case) status report filed with U.S. Magistrate today, August 20, 2014;

(G) State v. Frankie McGee (Murder) (Return to Petition for Writ of Certiorari) filed in the S.C. Supreme Court on August 13, 2014;

(H) Vante Birch v. Bush (Federal Habeas Return) filed on September 2, 2014 in the U.S. District Court;

(I) Adrian Allen v. McFadden (Federal Habeas Return) filed September 5, 2014 in the U.S. District Court;

(J) State v. Matthew Fullbright (Murder) oral argument on September 10, 2014, in the S.C. Court of Appeals;

(K) Alfonzo Staton v. State (Federal Habeas Corpus Case) Status Report to U.S. Magistrate filed September 9, 2014;

(L) Stanko v. State (Capital PCR) prepared 2nd Motion to Compel, filed September 10, 2014 in Georgetown County Court of Common Pleas;

(M) James E. Kennedy v. Cartledge (Federal Habeas Return) filed September 16, 2014 in the U.S. District Court;

(N) James Willie Elkins v. Cartledge (Federal Habeas Return) filed September 17, 2014 in the U.S. District Court;

(O) Stanko v. State (Capital PCR) Status conference in Conway, S.C. yesterday September 18, 2014;

(P) State v. Lakethon Hall (Initial Brief of Respondent)(Murder X 2) in process;

and, other matters.

(2) Respondent has consulted with opposing counsel, David Alexander, and he does not object to the requested extension. This is a 3rd extension request.

For good cause shown, Respondent respectfully requests this Court grant an extension of thirty (30) days up to and including **October 20, 2014** in which to file the Initial Brief of Respondent.

Respectfully submitted,

ALAN WILSON
Attorney General

JOHN MCINTOSH
Chief Deputy Attorney General

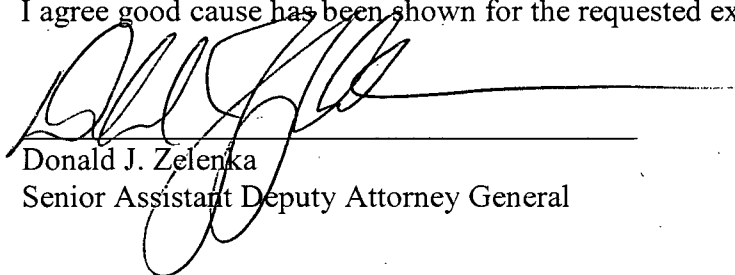
DONALD J. ZELENKA
Senior Assistant Deputy Attorney General

ANTHONY MABRY
Assistant Attorney General
ATTORNEYS FOR RESPONDENT

By: 
Anthony Mabry

Post Office Box 11549
Columbia, South Carolina 29211
(803) 734-6305

I agree good cause has been shown for the requested extension.


Donald J. Zelenka
Senior Assistant Deputy Attorney General

September 19, 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 InterAgency Mail to David Alexander, Esquire, 1330 Lady Street, Suite 401, Columbia, SC 29201 this 19th day of September, 2014.



ANTHONY MABRY
Assistant Attorney General

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ALAN WILSON
ATTORNEY GENERAL

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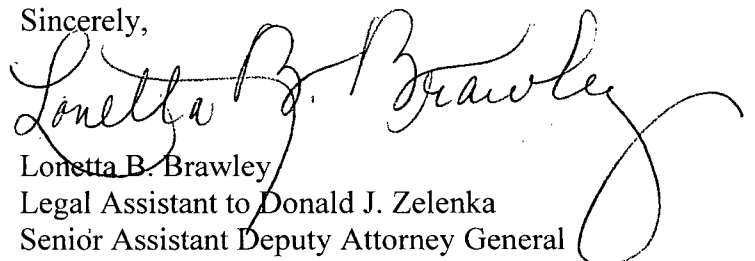
Honorable Jenny A. Kitchings
Clerk, South Carolina Court of Appeals
P. O. Box 11629
Columbia, SC 29211

Re: The State v. Willie M. Williams
Appellate Case No. 2013-001152

Dear Ms. Kitchings:

Enclosed please find a Motion to Enlarge Time for Filing Initial Brief of Respondent and Designation of Matter in the above-captioned matter for filing in your office. By copy of this letter, I am serving opposing counsel with same.

Sincerely,


Lonetta B. Brawley
Legal Assistant to Donald J. Zelenka
Senior Assistant Deputy Attorney General

/lbb
Enclosure

cc: David Alexander, Esquire