

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

**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 Monday, October 20, 2014. The undersigned attorneys for the above Respondent move that the time for return be extended to November 19, 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) Michael B. Dunham v. Warden (Murder) (Federal Habeas Return) filed October 15, 2014 in U.S. District Court (Approximately 60 pages):
 - (B) State v. Lakeithon Hall (Murder) (Initial Brief of Respondent) in process and

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close to completion;

- (C) Myra Christenbury v. Warden (Murder) (Federal Habeas Return) **in process;**
- (D) State v. Antonio Miller (Murder) **preparation for and oral argument on October 6, 2014** in the S.C. Court of Appeals;
- (E) State v. Christopher Heller (Murder) **preparation for and oral argument on October 7, 2014** in S.C. Supreme Court;
- (F) LaRoche v. Warden (Federal Habeas Matter) Reply to Return to Motion for Summary Judgment **filed October 14, 2014** in U.S. District Court;
- (G) Joshua Johnson v. Warden, (Federal Habeas Return) **filed in United States District Court on October 2, 2014;**
- (F) State v. Matthew Fullbright (Murder) preparation for and **oral argument on September 10, 2014;**
- (G) Stanko v. State (Capital PCR) 2nd Motion to Compel, **filed the week of September 10, 2014 and Motion heard on September 18, 2014 in Horry County before Circuit Judge Jeffrey Young;**
- (H) James Elkins v. Warden (Federal Habeas Return) **filed in United States District Court on September 17, 2014;**
- (I) Vincent Neumon v. Warden (Federal Habeas Return) **filed in United States District Court on September 25, 2014;**
- (J) James Kennedy v. Warden (Federal Habeas Return) **filed in United States District Court on September 16, 2014;**
- (K) State v. Marcus Wright (IBOR) Reducing Brief to 65 pages *at the order and direction of this Court*, **in process;**

and, other matters.

- (2) Respondent has reviewed the trial transcript in this matter to prepare the Brief of Respondent;
- (3) Respondent has consulted with opposing counsel, David Alexander, and he does not object to the requested extension. This is a 4th extension request.

For extraordinary circumstances shown, Respondent respectfully requests this Court grant an extension of thirty (30) days up to and including **November 19, 2014** in which to file the Initial Brief of Respondent.

Respectfully submitted,

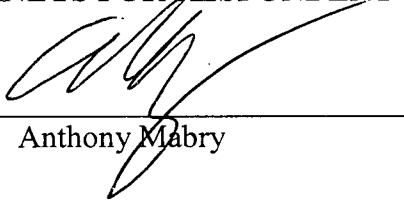
ALAN WILSON
Attorney General

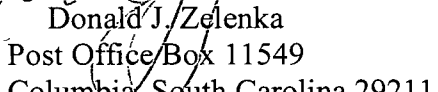
JOHN W. MCINTOSH
Chief Deputy Attorney General

DONALD J. ZELENKA
Senior Assistant Deputy Attorney General

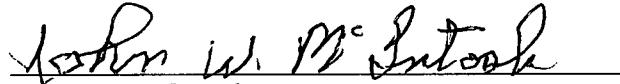
ANTHONY MABRY
Assistant Attorney General
ATTORNEYS FOR RESPONDENT

By: _____


Anthony Mabry


Donald J. Zelenka
Post Office Box 11549
Columbia, South Carolina 29211
(803) 734-6305

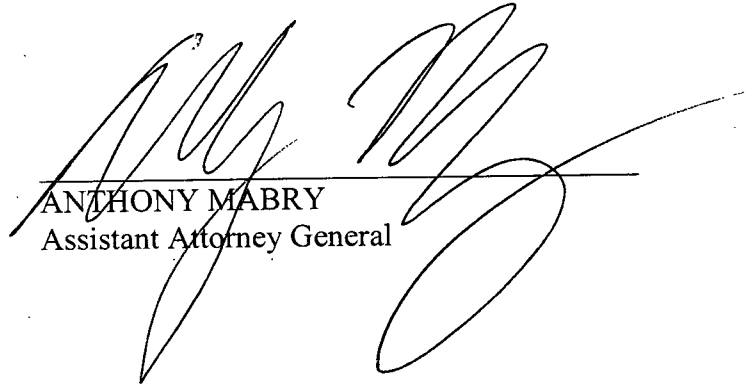
I agree extraordinary circumstances have been shown for the requested extension.


John W. McIntosh
Chief Deputy Attorney General

October 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 InterAgency Mail to David Alexander, Esquire, 1330 Lady Street, Suite 401, Columbia, SC 29201 this 20th day of October, 2014.



ANTHONY MABRY
Assistant Attorney General

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ALAN WILSON
ATTORNEY GENERAL

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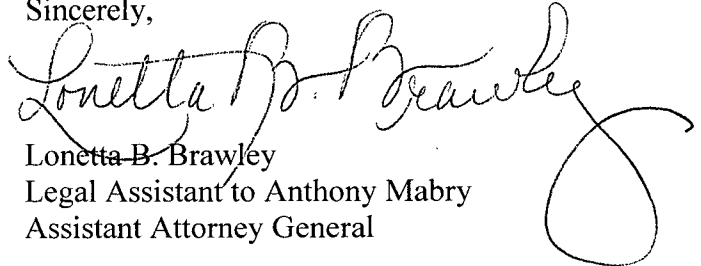
Honorable Jenny A. Kitchings
Clerk, South Carolina Court of Appeals
P. O. Box 11629
Columbia, SC 29211

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 Anthony Mabry
Assistant Attorney General

/lbb
Enclosure

cc: David Alexander, Esquire