

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 November 19, 2014. The undersigned attorneys for the above Respondent move that the time for return be extended to December 19, 2014. This motion is made because Respondent has completed *a portion of the Brief of Respondent*, but 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):**

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SC Court of Appeals

- (B) State v. Lakeithon Hall (Murder) (Initial Brief of Respondent) **filed November 10, 2014 in the S.C. Court of Appeals (approximately 38 pages);**
- (C) Myra Christenbury v. Warden (Murder, Armed Robbery) (Federal Habeas Return) **in process and almost complete (approximately 122 pages);**
- (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;**
- (H) State v. Matthew Fullbright (Murder) preparation for and **oral argument on September 10, 2014;**
- (I) Stanko v. State (Capital PCR)(Stanko II)(Return to Final Amended PCR Application and Motion to Dismiss) **filed on or about October 30, 2014;**
- (J) James Elkins v. Warden (Federal Habeas Return) **filed in United States District Court on September 17, 2014;**
- (K) Vincent Neumon v. Warden (Federal Habeas Return) **filed in United States District Court on September 25, 2014;**
- (L) James Kennedy v. Warden (Federal Habeas Return) **filed in United States District Court on September 16, 2014;**
- (M) State v. Marcus Wright (IBOR) Reducing Brief to 65 pages *at the order and direction of this Court*, **filed in S.C. Court of Appeals on November 3, 2014;**
- (N) State v. Antonio Scott (Murder) Brief of Respondent **filed in the S.C. Supreme Court on November 6, 2014;**
- (O) Henderson v. McFadden (Burglary) (Federal Habeas) **review of Report and Recommendation granting Motion for Summary Judgment today November 28, 2014;**

(P) State v. Mathew Fullbright (Murder) Direct Appeal review of this Court's Order regarding the same and discussion with supervisor and victim's daughter last week;

and, other matters.

- (2) Respondent has consulted with opposing counsel, David Alexander, and he does not object to the requested extension. This is a 5th extension request.
- (3) A law clerk was assisting Respondent's attorney on this brief; however, he just left the Attorney General's Office last week. Respondent is meeting with the Assistant Solicitor who prosecuted the case in Greenville this Friday regarding issues raised by the brief.

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

Respectfully submitted,

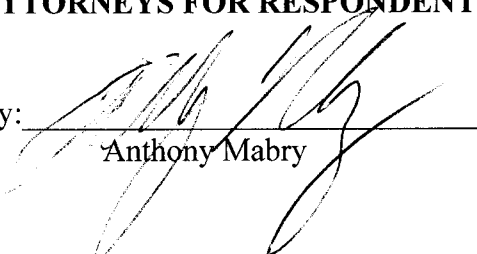
ALAN WILSON
Attorney General

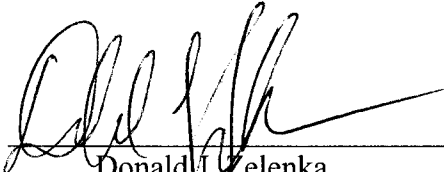
JOHN W. MCINTOSH
Chief Deputy Attorney General

DONALD J. ZELENKA
Senior Assistant Deputy Attorney General

ANTHONY MABRY
Assistant Attorney General
ATTORNEYS FOR RESPONDENT

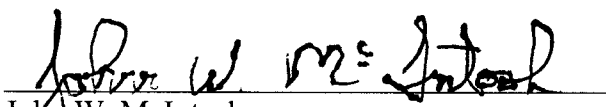
By: _____


Anthony Mabry



Donald J. Zelenka
Post Office Box 11549
Columbia, South Carolina 29211
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I agree extraordinary circumstances have been shown for the requested extension.



John W. McIntosh
Chief Deputy Attorney General

November 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 November, 2014.



ANTHONY MABRY
Assistant Attorney General

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ALAN WILSON
ATTORNEY GENERAL

November 19, 2014

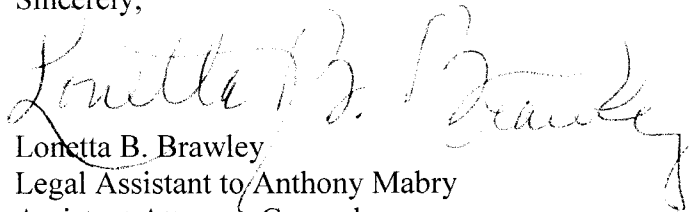
Honorable Jenny A. Kitchings
Clerk, South Carolina Court of Appeals
P. O. Box 11629
Columbia, SC 29211

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

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