

STATE OF SOUTH CAROLINA  
In the Court of Appeals

Appeal from Charleston County  
J. C. Buddy Nicholson, Jr., Circuit Court Judge

**RECEIVED**

MAR 09 2015

The State of South Carolina,

Respondent, **SC Court of Appeals**

v.

Torren Marquize Eady,

Appellant,

Appellate Case No.: 2014-000375.

**MOTION FOR SECOND EXTENSION OF TIME TO FILE  
INITIAL BRIEF OF RESPONDENT AND DESIGNATION OF MATTER**

Respondent, the State, moves this Court for an additional thirty (30) day extension of time in which to file the Initial Brief of Respondent and Designation of Matter. This is Respondent's second request for an extension of time in which to file the brief. In support of the request, undersigned counsel would respectfully show the Court:

1. Undersigned counsel for Respondent has been scheduled for a number of state and federal matters in the last thirty (30) days, that include, but are not limited to, the following: prepared and filed returns and memoranda of law in support of motion for summary judgment in five (5) federal habeas actions (*Steven Whitt; Antonio Hair; Daniel Brown; Warren Russell; Nathaniel Caldwell*); prepared and filed a response in opposition to motion for summary judgment in one of the listed cases (*Daniel Brown*); prepared and filed a reply to response in opposition to motion for summary judgment in another federal habeas action (*John Mills*); prepared and filed a motion for access to sealed order relied upon in appellant's return to the state's motion in a capital case on direct appeal in the Supreme Court of South Carolina (*Ricky*

*Lee Blackwell*); prepared and filed a reply in a capital matter in the original jurisdiction of the Supreme Court of South Carolina (*Steven Barnes*); reviewed and filed a final brief of respondent in a non-capital murder direct appeal in this Court (*Marcus Bailey*); prepared and filed proposed orders from the February 2, 2015 motions hearing in a capital post-conviction relief case (*William Dickerson*); prepared and filed in the Supreme Court of South Carolina, two returns to separate petitions for writ of certiorari in two non-capital murder direct appeals (*Alexander Hunsberger*; *Julio Hunsberger*); prepared and filed a reply to motion for stay and memorandum in opposition to State's motion to dismiss, and prepared for and attended a February 12, 2015 hearing in Charleston, SC, on pending motions in a capital case where applicant is seeking a successive PCR action (*Brad Sigmon*); prepared and filed a return and motion to stay in a post-conviction relief action regarding issues from a prior capital trial (*Steven Louis Barnes*); and, prepared and filed a return to a motion to alter or amend the order of dismissal, at the request of the PCR judge, in another capital post-conviction relief action (*Steven Bixby*). Counsel is also preparing for completion of an evidentiary hearing for another capital post-conviction relief action scheduled to begin again on March 30th (*Quincy Allen*); completed review of a transcript and initial brief of appellant in a non-capital murder direct appeal for completion of the initial brief of respondent (*Tyrel Collins*); and is currently working on document preparation and returns in three other federal habeas actions (*William Childers*; *Keith Sims*; *Tyrone Patrick*), and drafting a proposed order in the successive PCR action referenced above (*Brad Sigmon*).

2. Due to her heavy case load, undersigned counsel for Respondent has not been able, in a timely fashion, to complete the initial brief in this appeal.

3. This is the second request for an extension of time in which to file a response.

WHEREFORE, undersigned counsel for Respondent respectfully requests an additional extension of thirty (30) days to complete 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

MELODY J. BROWN  
Senior Assistant Attorney General

BY:   
\_\_\_\_\_  
MELODY J. BROWN  
S.C. Bar No. 14244

Office of the Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29211  
(803) 734-6305

March 9, 2015.  
Columbia, South Carolina.

ATTORNEYS FOR RESPONDENT

STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

Appeal from Charleston County  
J. C. Buddy Nicholson, Jr., Circuit Court Judge

---

**RECEIVED**  
MAR 09 2015  
SC Court of Appeals

The State of South Carolina,

Respondent,

v.

Torren Marquize Eady,

Appellant,

Appellate Case No.: 2014-000375.

---

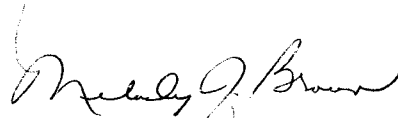
**PROOF OF SERVICE**

---

I, Melody J. Brown, certify that I have served Respondent's Motion for a Second Extension of Time on counsel for Appellant, by depositing one copy of same in the United States mail, postage prepaid, to counsel for appellant, addressed as follows:

Robert M. Dudek, Esq.  
Chief Appellate Defender  
SCCID/Division of Appellate Defense  
PO Box 11589  
Columbia, SC 29211

This 9<sup>th</sup> day of March, 2015.



---

MELODY J. BROWN  
S.C. Bar No. 14244

Office of Attorney General  
Post Office Box 11549  
Columbia, SC 29211  
(803) 734-6305

ATTORNEY FOR RESPONDENT



ALAN WILSON  
ATTORNEY GENERAL

March 9, 2015

RECEIVED

MAR 9 2015

SC Court of Appeals

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

Re: The State v. Torren M. Eady  
Appeal from Charleston County  
Appellate Case No. 2014-000375

Dear Ms. Kitchings:

Enclosed please find the original and one (1) copy of Respondent's Motion for Second Extension of Time to file Initial Brief of Respondent and Designation of Matter with a Proof of Service in the above-referenced matter.

Thank you for your assistance in this matter.

Sincerely,

Melody J. Brown  
Senior Assistant Attorney General

MJB/mv  
Enclosures

cc: Robert M. Dudek, Esq., Chief Appellate Defender