

STATE OF SOUTH CAROLINA
In the Court of Appeals

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MAY 26 2015

Appeal from Horry County
Benjamin H. Culbertson, Circuit Court Judge

SC Court of Appeals

The State of South Carolina,

Respondent,

v.

Sandy Lee Locklear,

Appellant,

Appellate Case No.: 2014-001354.

**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 two (2) federal habeas actions (*Virgil Culbreath; Robert Bostic*); aided and reviewed in the completion of returns in two other federal habeas actions (*Herman McKnight; Roy Johnson*); prepared and filed two responses in opposition to motions to amend post-judgment (*Emmett* prepared and filed a response in opposition to motion for default judgment in one of the federal habeas actions listed above (*Robert Bostic*); prepared and filed a response in opposition to a motion to dismiss in another federal habeas action (*Daniel Brown*); completed and filed an initial

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.

THEREFORE, undersigned counsel for Respondent respectfully requests an additional extension of thirty (30) days to complete the Initial Brief of Respondent and Designation of Matter.

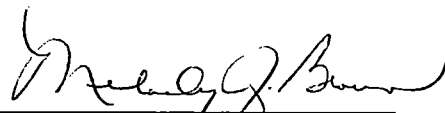
Respectfully submitted,

ALAN WILSON
Attorney General

JOHN W. McINTOSH
Chief Deputy Attorney General

DONALD J. ZELENKA
Senior Assistant Deputy Attorney General

MELODY J. BROWN
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BY: 
MELODY J. BROWN
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May 26, 2015.
Columbia, South Carolina.

ATTORNEYS FOR RESPONDENT

brief of respondent in a non-capital murder direct appeal in this Court (*Torren Eady*); prepared filed a response in opposition to motion for evidentiary hearing in another federal habeas action (*Antonio Boykin*); prepared and filed a response in opposition to motion to stay in another federal habeas action (*Nathaniel Caldwell*); prepared and filed a response in opposition to motion to compel in another federal habeas action (*Warren Russell*); and, reviewed and prepared for filing today in this Court a final brief of respondent in another non-capital murder direct appeal matter (*Tyrel Collins*). In addition, counsel researched and prepared a memo in regards to a currently pending death penalty action in preparation for a hearing that occurred on April 30, 2015 in Charleston County which counsel attended (*Jesse Sapp*); counsel also reviewed a successive action, attended an appointment of counsel hearing in Berkeley County on May 22, 2015, and drafted a return and motion for summary judgment in the PCR action related to that same capital matter (*Jesse Sapp*); made final preparation and arrangement for a final day of an evidentiary hearing in another capital case in post-conviction relief (*Andres Torres*); prepared for and a motion hearing in Richland County in another capital post-conviction relief action (*William Dickerson*); prepared for and attended a hearing in Lexington County in another capital case (*Richard Wood*); prepared and filed a return to a petition for stay of execution in another capital case (*Stephen Corey Bryant*); and, received and reviewed for possible petition for rehearing an Opinion in a non-capital murder direct appeal in the Supreme Court of South Carolina (*Derrick McDonald*). Further, counsel prepared for and participated in two depositions on May 18, 2015 North Carolina of experts in another capital case in post-conviction relief (*Quincy Allen*); is currently reviewing an appellate decision and weighing potential additional action in another capital case in post-conviction relief (*Kamell Evans*); and is also preparing another habeas return to be filed this week (*Lavar Sanders*).

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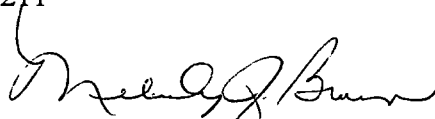
PROOF OF SERVICE

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:

Edwin Thompson Kinney, Esquire
Mullikin Law Firm
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Camden, SC 29020

Robert M. Dudek, Esquire
Chief Appellate Defender
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This 26th day of May, 2015.



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