

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Charleston County  
Kristi Lea Harrington, Circuit Court Judge

Appellate Case No. 2015-000306

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**RECEIVED**

MAR 23 2016

SC Court of Appeals

THE STATE,

Respondent,

v.

KADRIN RAJUN SINGLETON,

Appellant.

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

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Respondent's Initial Brief is due today, March 23, 2016. The undersigned counsel would respectfully request a thirty (30) day extension in which to file the Initial Brief of Respondent in the above-referenced case until April 22, 2016. In support of this motion, counsel would respectfully show the Court that Respondent has completed a majority of this brief but has not been able to complete all of the same due to the following:

- (1) The attorney for the Respondent has had a number of State and Federal matters to attend to;
  - (A) The State v. Robert Prather (Murder Appeal)(Final Brief of Respondent) **filed in the S.C. Court of Appeals on March 7, 2016;**
  - (B) The State v. Willie Williams (Murder Appeal) preparation for Oral Argument which was **held on March 9, 2016 in the S.C. Court of Appeals;**
  - (C) Terrance Thompkins v. Warden (ABWIK (2 Counts) AWIK) (Federal Habeas Return) 59 pages, **filed March 22, 2016 in U.S. District Court;**
  - (D) Deleon Thompson v. Warden (Armed Robbery)(Federal Habeas Return) 50 pages, **filed March 15 , 2016 in U.S. District Court;**

- (E) David Carson v. Warden (Murder) (Federal Habeas Return) *in process and almost complete*, to be filed in U.S. District Court;
- (F) Little Johnny Lee Mackey v. Warden (Murder) (Federal Habeas Return) in process;
- (G) Quentin Holt v. Warden (Distribution of Crack [2 counts]) (Federal Habeas Return) in process;
- (H) Stanko v. State (Capital PCR) (Draft of Proposed Order of Dismissal, to be submitted to Judge Jeffrey Young;
- (I) Gena Beatty v. Warden (Federal Habeas Matter) assisting Mr. Zelenka with Response to Petitioner's Motion for Reimbursement of Fees as directed by the Federal District Court;
- (J) Dorothy Harden v. Warden (Federal Habeas Matter) Telephone status conference with U.S. Magistrate Judge Kaymani West and eventual dismissal of action without prejudice;

**and other matters.**

(2) Respondent's attorney was on medical leave February 29<sup>th</sup> through March 4, 2016  
[heart cath. and stint].

WHEREFORE, premises considered, for good cause shown, counsel hereby respectfully requests a thirty (30) day extension of time until April 22, 2016 to serve and file the Initial Brief of Respondent and Designation of Matter. This is a 2<sup>nd</sup> extension request.

ALAN WILSON  
Attorney General

JOHN W. McINTOSH  
Chief Deputy Attorney General

DONALD J. ZELENKA  
Senior Assistant Deputy Attorney General

ANTHONY MABRY  
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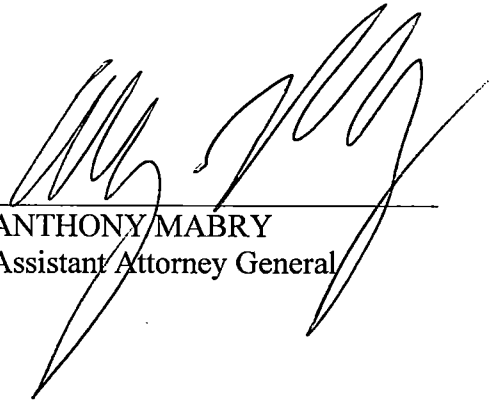
By: \_\_\_\_\_

ANTHONY MABRY

March 23, 2016

**CERTIFICATE OF SERVICE**

I, Anthony Mabry, hereby certify that I have served the Motion for an Extension to File Initial Brief of Respondent and Designation of Matter by depositing copy in the InterAgency Mail to David Alexander, Esquire, Division of Appellate Defense, 1330 Lady Street, Ste. 401, Columbia, SC 29201 this 23<sup>rd</sup> day of March, 2016.



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ANTHONY MABRY  
Assistant Attorney General

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SC Court of Appeals



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MAR 23 2016

SC Court of Appeals

ALAN WILSON  
ATTORNEY GENERAL

March 23, 2016

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

Re: The State v. Kadrin Singleton  
Appellate Case No. 2015-000306

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,

Pamela Cooper  
Legal Assistant to Anthony Mabry  
Assistant Attorney General

/pjc  
Enclosure

cc: David Alexander, Esquire