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COD: 4/22  
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STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

Appeal from Charleston County  
Kristi Lea Harrington, Circuit Court Judge

Appellate Case No. 2015-000306

RECEIVED

APR 22 2016

SC Court of Appeals

THE STATE,

Respondent,

v.

KADRIN RAJUN SINGLETON,

Appellant.

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

Respondent's Initial Brief is due today, April 22, 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 May 23, 2016. In support of this motion, counsel would respectfully show the Court that Respondent *has completed the great majority or almost all 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) Terrence Thompkins v. Warden (ABWIK (2 Counts) AWIK) (Federal Habeas Return) 59 pages, filed March 22, 2016 in U.S. District Court;
- (B) David Carson v. Warden (Murder) (Federal Habeas Return) filed March 28, 2016 in U.S. District Court;
- (C) Little Johnny Lee Mackey v. Warden (Federal Habeas Return)(Murder) filed April 4, 2016 in U.S. District Court;
- (D) Stanko v. State (Capital PCR) (Draft of Proposed Order of Dismissal, to be submitted to Judge Jeffrey Young on April 29, 2016;

- (E) 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;
- (F) William Dickerson v. State (Capital PCR Hearing) **March 31, 2016 before Judge Thomas Cooper;**
- (G) Jerry Buck Inman (Capital PCR) Preparation for Trial now scheduled on August 22, 2016 before Judge Macaulay [Review of Discovery Responses, draft of Proposed Scheduling Order, telephone conference with counsel and Judge Macaulay];
- (H) Clarence Scott Miller v. Eagleton (Federal Habeas Return)(Burglary 1<sup>st</sup> Degree & other charges) **filed April 7, 2016 in U.S. District Court;**
- (I) Gary Grant v. Warden (Murder, Armed Robbery, Burglary 1<sup>st</sup>)(Federal Habeas Return) **filed April 8, 2016 in U.S. District Court;**
- (J) The State v. Antonio Miller (Murder Appeal) **Petition for Rehearing by State filed in S.C. Supreme Court on April 14, 2016;**
- (K) Derrick F. Williams v. Riley (Federal Habeas) **Reply to Response in Opposition to Motion for Summary Judgment, filed April 19, 2016 in the U.S. District Court;**
- (L) The State v. Steven Otts (Murder Appeal) preparation for and Oral Argument which was **held on April 20, 2016 in the S.C. Court of Appeals;**
- (M) Stacy Pringle v. Warden (Federal Habeas Matter) Objections to Report and Recommendation of Judge Kaymani West, Objections **filed April 21, 2016 in U.S. District Court;**
- (N) State v. Luzenkski Cottrell (Capital Murder/Death Penalty) Preparation of Initial Brief of Respondent, **currently in process;**
- (O) Quintin Holt v. Warden (Federal Habeas Return) **in process and due May 2, 2016;**
- (P) Review of numerous Reports and Recommendations or Orders from the United States District Court in various federal habeas matters;

**and other matters.**

2. Respondent has consulted with opposing counsel David Alexander, Esquire, of the Office of Appellate Defense, and he has no objection to the requested extension.

WHEREFORE, premises considered, for good cause shown, counsel hereby respectfully requests a thirty (30) day extension of time until May 23, 2016 to serve and file the Initial Brief of Respondent and Designation of Matter. This is a 3<sup>rd</sup> extension request.

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  
Post Office Box 11549  
Columbia, South Carolina 29211  
(803) 734-6305

By:

  
ANTHONY MABRY

I agree good cause has been shown.

  
DONALD J. Zelenka

April 22, 2016

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**APR 22 2016**

**SC Court of Appeals**

**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 22<sup>nd</sup> day of April, 2016.

  
\_\_\_\_\_  
ANTHONY MABRY  
Assistant Attorney General



ALAN WILSON  
ATTORNEY GENERAL

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SC Court of Appeals

April 22, 2016

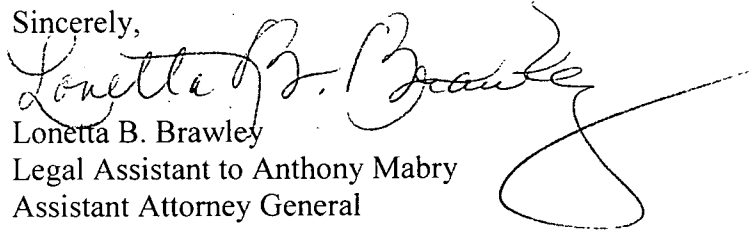
Honorable Jenny A. Kitchings  
Clerk, South Carolina Court of Appeals  
P. O. Box 11629  
Columbia, SC 29211

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,

  
Lonetta B. Brawley  
Legal Assistant to Anthony Mabry  
Assistant Attorney General

/lbb  
Enclosure

cc: David Alexander, Esquire