

**STATE OF SOUTH CAROLINA**  
**In the Court of Appeals**

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Appeal from Greenville County  
The Honorable Edward W. Miller, Circuit Court Judge  
Appellate Case No. 2011-186367

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The State of South Carolina,

Respondent,

v.

Robert Mondriques Jones,

Appellant.

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

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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. In support of this motion, counsel would respectfully show the Court the following:

Respondent's Initial Brief is due today, October 22, 2012, upon this Court's grant of Respondent's second request for an extension filed on September 24, 2012.

The undersigned attorney for the Respondent has had a number of state and federal matters to attend to since September 12, 2012. This motion is made because the Respondent has not been able to respond within the allotted time for the following reasons:

1. Counsel filed a return to a petition for writ of certiorari in a non-capital murder appeal (*Jake Antonio Wilson*); completed and filed a return and memorandum of law in support of motion for summary judgment in a federal habeas action (*Mikal J. Ruffin*); attended a hearing before the U.S.

District Court, Columbia Division (*Levon Mintz*); was out of the country on a planned vacation from September 14, 2012 to September 24, 2012; prepared a Petition for Rehearing in an Horry County direct appeal matter (*Richard Bill Niles, Jr.*); filed a return and memorandum of law in support of motion for summary judgment in a federal habeas action (*Donnie P. Blanchard*); aided in the preparation of a Motion for Reconsideration in an Horry County capital PCR matter (*Louis Winkler*); prepared the Initial Brief of Respondent and Designation of Matter, together with a Motion to Exceed Page Limit in a non-capital direct appeal matter (*Anthony Hackshaw*) and prepared a Return and Memorandum of Law in Support of Motion to Dismiss in a federal habeas action (*Jason Cambron*).

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

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

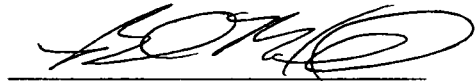
JOHN W. McINTOSH  
Chief Deputy Attorney General

DONALD J. ZELENKA  
Senior Assistant Deputy Attorney General

BRENDAN J. McDONALD  
Assistant Attorney General

W. WALTER WILKINS, III  
Solicitor, Thirteenth Judicial Circuit

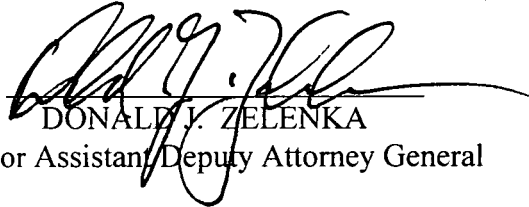
BY:



BRENDAN J. McDONALD,  
Assistant Attorney General

Office of the Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29211  
(803) 734-3188

BY:



DONALD J. ZELENKA  
Senior Assistant Deputy Attorney General

I support the finding of good cause.

October 22, 2012.

ATTORNEYS FOR RESPONDENT

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**PROOF OF SERVICE**

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I, Brendan J. McDonald, certify that I have served Respondent's Motion for Extension of Time to File the Initial Brief of Respondent and Designation of Matter on counsel for Appellant, by depositing one copy of same in the United States mail, postage prepaid, to counsel for appellant, addressed as follows:

Kathrine H. Hudgins, Esq.  
SCCID/Division of Appellate Defense  
1330 Lady St., Ste. #401  
Columbia, SC 29201-3332

This 22nd day of October, 2012.



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BRENDAN J. McDONALD

Office of Attorney General  
Post Office Box 11549  
Columbia, SC 29211  
(803) 734-3188

ATTORNEY FOR RESPONDENT



ALAN WILSON  
ATTORNEY GENERAL

October 22, 2012

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

Re: *The State v. Robert Mondriques Jones*  
Appeal from Greenville County  
Appellate Case No.: 2011-186367

Dear Ms. Kitchings:

Enclosed please find the original and six (6) copies of Respondents' Motion for Extension of Time to file Initial Brief of Respondent and Designation of Matter, together with a Proof of Service in the above-referenced matter.

Thank you for your assistance in this matter.

Sincerely,

Brendan J. McDonald  
Assistant Attorney General

BM:dmd

Enclosures

cc: Katherine H. Hudgins, Esq. (w/two copies of encls.)