

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Greenwood County
Frank R. Addy, Jr., Circuit Court Judge

RECEIVED

MAY 26 2016

SC Court of Appeals

STATE OF SOUTH CAROLINA,

Appellant,

vs.

EDWARD DEAN,

Respondent.

**MOTION TO HOLD TIMELINES IN
ABEYANCE PENDING RECEIPT OF
TRANSCRIPTS OR IN THE ALTERNATIVE
AN EXTENSION OF TIME**

The Appellant State of South Carolina respectfully requests this Court to hold all time lines in abeyance pending receipt of the transcripts from (1) the hearing granting Respondent Dean's motion for new trial; (2) the trial itself; and (3) Co-defendant Gaston's sentencing hearing. The transcripts for all these proceedings have already been requested by the State (see attachments).

Respondent Dean made a motion to dismiss dated May 16, 2016. In making that motion, Dean makes numerous references without citation to the proceedings listed above. By the State's calculation, the return to this motion is due on today's date. However, the transcripts listed above are necessary for undersigned counsel to more fully respond to the motion to dismiss. Accordingly, the State respectfully requests the matter be held in abeyance until the State receives

the above transcripts.

In the alternative, the State would respectfully request a thirty day extension of time in which to make its response to the motion.

IV.

WHEREFORE, Appellant respectfully requests this Court hold all timelines, including the due date for the motion to dismiss the appeal, in abeyance. In the alternative, Appellant respectfully requests a thirty day extension of time to file its return to Respondent's motion.

Respectfully submitted,

ALAN WILSON
Attorney General

DAVID SPENCER
Senior Assistant Attorney General
Bar # 68571

DAVID M. STUMBO
Solicitor, Eighth Judicial Circuit

BY: 

DAVID SPENCER

Office of the Attorney General
Post Office Box 11549
Columbia, SC 29211
(803) 734-3727

ATTORNEYS FOR APPELLANT

May 26, 2016

The State of South Carolina



OFFICE OF THE SOLICITOR
EIGHTH JUDICIAL CIRCUIT

864/942-8800
FAX 864/942-8830

Abbeville
Greenwood
Laurens
Newberry

DAVID M. STUMBO
SOLICITOR

Suite 203, Park Plaza
600 Monument Street
Post Office Box 516
Greenwood, SC 29648-0516

May 24, 2016

Tara T. Scott
1849 Stevenson Rd.
Abbeville, SC 29620

RE: State v. Edward Dean
Case Nos.: 2012-A24-102-000357, 2012-A24-102-00387, 389, 390

Dear Ms. Scott:

Please provide our office with a transcript of multiple motions heard by Judge Addy concerning the above case in Greenwood County on December 11, 2013. We also need a transcript of the trial where Mr. Dean was found guilty on March 5, 2014 before Judge Addy in Greenwood County. This case is on appeal and therefore, we would respectfully request these transcripts as soon as possible.

If you need a deposit for these transcripts or any further information, please do not hesitate to contact me at (864) 942-8802.

Sincerely,

A handwritten signature in cursive script that reads "Debbie Grubbs".

Debbie Grubbs
Administrative Assistant

The State of South Carolina



OFFICE OF THE SOLICITOR
EIGHTH JUDICIAL CIRCUIT

864/942-8800
FAX 864/942-8830

Abbeville
Greenwood
Laurens
Newberry

DAVID M. STUMBO
SOLICITOR

Suite 203, Park Plaza
600 Monument Street
Post Office Box 516
Greenwood, SC 29648-0516

May 24, 2016

Tara T. Scott
1849 Stevenson Rd.
Abbeville, SC 29620

RE: State v. Edward Dean
Case Nos.: 2012-A24-102-000357, 2012-A24-102-00387, 389, 390

Dear Ms. Scott:

We have requested several transcripts concerning the above case but failed to request a transcript of the hearing held on **April 13, 2016 before Judge Addy in Greenwood County**. We respectfully request that this transcript be submitted before you start on the precious transcripts requested.

If you need a deposit for any requested transcripts or any further information, please do not hesitate to contact me at (864) 942-8802.

Sincerely,

Debbie Grubbs
Administrative Assistant

The State of South Carolina

OFFICE OF THE SOLICITOR
EIGHTH JUDICIAL CIRCUIT



864/942-8800
FAX 864/942-8830

Abbeville
Greenwood
Laurens
Newberry

DAVID M. STUMBO
SOLICITOR

Suite 203, Park Plaza
600 Monument Street
Post Office Box 516
Greenwood, SC 29648-0516

May 24, 2016

Joy E. Holston
118 Sandy Beach Drive
Prosperity, SC 29127

RE: State v. Edward Dean
Case Nos.: 2012-A24-102-000357, 2012-A24-102-00387, 389, 390

Dear Joy:

We respectfully request a transcript of the hearing held before Judge Addy on June 9, 2014 concerning the above case.

If you need a deposit for the transcript or any further information, please do not hesitate to contact me at (864) 942-8802.

Sincerely,

Debbie Grubbs
Administrative Assistant

The State of South Carolina

OFFICE OF THE SOLICITOR
EIGHTH JUDICIAL CIRCUIT



864/942-8800
FAX 864/942-8830

Abbeville
Greenwood
Laurens
Newberry

DAVID M. STUMBO
SOLICITOR

Suite 203, Park Plaza
600 Monument Street
Post Office Box 516
Greenwood, SC 29648-0516

May 24, 2016

Cheri L. Young
P.O. Box 5232
Aiken, SC 29804

RE: State v. Adrian Gaston
Case Nos.:2012-A24-10200-391

Dear Ms. Young:

Please provide our office with a transcript of the hearing where Adrian Gaston plead guilty to burglary before Judge Russo on May 14, 2015 in Saluda County. (This is a Greenwood County case but her hearing was held in Saluda County). This case is on appeal and therefore, we would respectfully request these transcripts as soon as possible.

If you need a deposit for these transcripts or any further information, please do not hesitate to contact me at (864) 942-8802.

Sincerely,

A handwritten signature in cursive script that reads "Debbie Grubbs".

Debbie Grubbs
Administrative Assistant

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal From Greenwood County
Honorable Frank R. Addy, Jr., Circuit Court Judge

RECEIVED

MAY 26 2016

SC Court of Appeals

THE STATE,

RESPONDENT,

vs.

EDWARD DEAN,

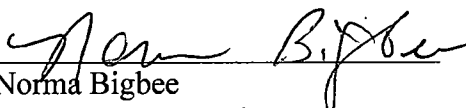
APPELLANT.

PROOF OF SERVICE

I, Norma Bigbee, certify that I have served the Respondent's Motion To Hold Timelines In Abeyance Pending Receipt of Transcripts or in the Alternative An Extension of Time on Appellant by depositing a copy of the same in the United States mail, postage prepaid, addressed to: Ernest Charles Grose, Jr., Esquire, 404 Main St., Greenwood, SC 29646.

I further certify that all parties required by Rule to be served have been served.

This 26th day of May, 2016.



Norma Bigbee
Administrative Assistant
Office of Attorney General
Post Office Box 11549
Columbia, SC 29211
(803) 734-3727



ALAN WILSON
ATTORNEY GENERAL

May 26, 2016

RECEIVED

MAY 26 2016

SC Court of Appeals

VIA HAND DELIVERY

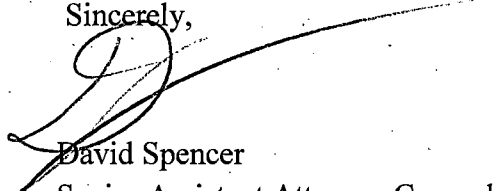
The Honorable Jenny A. Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

RE: **State of South Carolina v. Edward Dean**
Appellate Case No: 2016-001004

Dear Ms. Kitchings:

Enclosed please find the Original Respondent's Motion To Hold Timelines In Abeyance Pending Receipt of Transcripts Or in the Alternative an Extension of Time.

Sincerely,



David Spencer
Senior Assistant Attorney General
Bar No: 68571

DS/nb

Enclosures

cc: Ernest Charles Grose, Esquire
Trisha Allen