

2nd PRTS due 7/25/16

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STATE OF SOUTH CAROLINA  
In the Court of Appeals

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JUL 25 2016

SC Court of Appeals

Appeal from Hampton County  
The Honorable Perry M. Buckner, III, Circuit Court Judge

THE STATE,

Respondent,

v.

DALONTE GREEN,

Appellant.

Appellate Case No. 2015-001059

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 a reply to a response to a motion for summary judgement in a federal habeas action (*William Gregg*); prepared and filed a reply to a response in opposition to a motion for summary judgment in a federal habeas action (*Julie Mason*); prepared and filed a response in opposition to a motion to compel discovery in a federal habeas action (*John Alexander*); prepared and filed a reply to a response in opposition to a motion for summary judgment in a

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federal habeas action (*Dwayne Housey*); prepared a petition for rehearing in a federal habeas action for the Fourth Circuit Court of Appeals (*Keith Clark*); and is currently preparing a return and motion for summary judgment in a federal habeas action in which the Petitioner has raised twenty-one grounds for habeas relief (*Turuk Saunders*).

3. The undersigned counsel has completed a draft of her initial brief in this appeal and all pertinent documents are prepared for filing. Counsel anticipates perfecting the brief and filing within the time requested.

4. Due to her case load, undersigned counsel for Respondent has not been able, in a timely fashion, to complete the final version of initial brief in this appeal and would request the additional time in order to do so.

5. This is the second request for an extension of time in which to file a response.

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

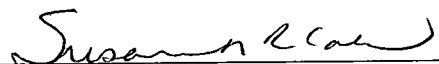
Respectfully submitted,

ALAN WILSON  
Attorney General

JOHN W. McINTOSH  
Chief Deputy Attorney General

DONALD J. ZELENKA  
Senior Assistant Deputy Attorney General

SUSANNAH R. COLE  
Assistant Attorney General

BY:   
\_\_\_\_\_  
SUSANNAH R. COLE  
SC Bar No. 68383

July 25, 2016  
Columbia, South Carolina

Office of the Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29211  
(803) 734-6305

ATTORNEYS FOR RESPONDENT

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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JUL 25 2016

Appeal from Hampton County  
The Honorable Perry M. Buckner, III, Circuit Court Judge

**SC Court of Appeals**

**THE STATE,**

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**Appellant.**

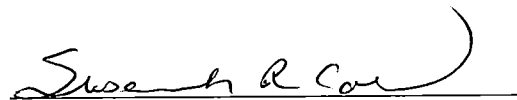
Appellate Case No. 2015-001059

**PROOF OF SERVICE**

I, Susannah R. Cole, 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:

Robert Dudek  
Chief Appellate Defender  
SCCID/Division of Appellate Defense  
P.O. Box 11589  
Columbia, SC 29211

This 25th day of July, 2016



Susannah R. Cole  
Assistant Attorney General  
SC Bar No. 68383  
Office of Attorney General  
Post Office Box 11549  
Columbia, SC 29211  
(803) 734-6305

ATTORNEY FOR RESPONDENT



**RECEIVED**

JUL 25 2016

SC Court of Appeals

ALAN WILSON  
ATTORNEY GENERAL

June 25, 2016

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

Re: The State v. Dalonte Green  
Appeal from Hampton County  
Appellate Case No. 2015-001059

Dear Ms. Kitchings:

I hereby request an extension of thirty (30) days in which to file the Initial Brief of Respondent and Designation of Matter in the above-referenced case. The Initial Brief is currently due to be served and filed today, July 25, 2016. However, because of my involvement in other matters in state and federal court, I have been unable to timely complete the Initial Brief.

Therefore, I am enclosing an original and six (6) copies of Respondent's Motion for Second Extension of Time to file the Initial Brief of Respondent and Designation of Matter, dated today, together with a Proof of Service in the above-referenced matter.

Thank you for your assistance in this matter. Please call this office if you need any additional information.

Sincerely,

Susannah R. Cole  
Assistant Attorney General

SRC/pcm

cc: Robert M. Dudek, Esquire, Chief Appellate Defender (w/two copies of encls.)