

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Beaufort County
The Honorable Thomas W. Cooper, Jr., Circuit Court Judge
Appeal Case No. 2015-000508

RECEIVED

JUL 27 2016

SC Court of Appeals

THE STATE,

RESPONDENT,

V.

AARON SCOTT YOUNG, JR.,

APPELLANT.

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

The undersigned counsel would respectfully request a thirty (30) day extension in which to file the Initial Brief of Respondent and Designation of Matter in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following:

Respondent's Brief is due today, July 27, 2016, upon this Court's grant of Respondent's fourth request for an extension filed on June 30, 2016 and second for below-signed counsel.

This Case was assigned to below-signed counsel on June 21, 2016. Counsel makes this second request due to her involvement in other matters within the past thirty days. Counsel has spent a significant amount of time drafting the Initial Brief of Respondent in the matter of State vs. Robert Lee Wright, a direct appeal in a Charleston County murder case pending before the South Carolina Court of Appeals. Counsel has also spent a substantial amount of time drafting the Returns and Memoranda of Law in Support of Motion for Summary Judgment in Leonard

Stanfield, #235306 vs. Warden Reynolds, a federal habeas action pending before the United States District Court for the District of South Carolina.

Counsel has also spent a significant amount of time reviewing the transcript and researching the issue in preparation for drafting the Initial Brief of Respondent in this matter. However, due to counsel's involvement in these and other matters pending in state and federal court, counsel is unable to timely complete the Initial Brief of Respondent and Designation of Matter in this proceeding. Thus, counsel is requesting an extension of time in which to file the Initial Brief of Respondent in this matter. This request is made in good faith, and not for the purposes of delay.

Counsel has contacted the Appellant's counsel, F. Elliott Quinn, who had advised counsel this date that he has no objections to the request.

WHEREFORE, premises considered, counsel hereby respectfully requests a thirty (30) day extension of time to serve and file the Initial Brief of Respondent and Designation of Matter.

Respectfully Submitted,

ALAN WILSON
Attorney General

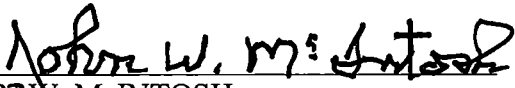
JOHN W. McINTOSH
Chief Deputy Attorney General

DONALD J. ZELENKA
Senior Assistant Deputy Attorney General


MARGARET G. BOYKIN
Assistant Attorney General
Bar No. 101017
Post Office Box 11549
Columbia, South Carolina 29211
(803) 734-3131

By: 

MARGARET G. BOYKIN

By: 
JOHN W. McINTOSH
Chief Deputy Attorney General

I support the finding of good cause.

By: 
DONALD J. ZELENKA
Senior Assistant Deputy Attorney General

I support the finding of good cause.

July 27, 2016.

ATTORNEYS FOR RESPONDENT

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PROOF OF SERVICE

I, Margaret G. Boykin, of counsel for the Respondent, certify that I have served a copy of the within motion for a fourth extension to file Initial Brief of Respondent and Designation of Matter via U.S. mail to his attorney of record, F. Elliotte Quinn, IV, Esquire, 200 Meeting Street, Suite 301, Charleston, SC 29401.

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

This 27th day of July, 2016.



MARGARET G. BOYKIN
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Columbia, South Carolina 29211
(803) 734-3131



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ALAN WILSON
ATTORNEY GENERAL

July 27, 2016

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

Re: The State v. Aaron Scott Young, Jr.
Appellate Case No. 2015-000508

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 Margaret G. Boykin
Assistant Attorney General

/lbb
Enclosure

cc: F. Elliotte Quinn, IV, Esquire