

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Appeal from Horry County
Steven H. John, Circuit Court Judge

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AUG 10 2016

SC SUPREME COURT

THE STATE,

Respondent,

v.

KAREEM S. HARRY,

Appellant.

Appellate Case No. 2015-002161

MOTION FOR EXTENSION OF TIME TO
FILE BRIEF OF RESPONDENT

The Respondent, above-named, by and through the undersigned attorneys, would respectfully move this Court for a 20-day extension of time within which to file its Brief of Respondent from August 10, 2016 up to and including August 30, 2016. Counsel for Respondent has completed *a majority* of its Brief of Respondent, but has not been able to complete the Brief within the allotted time for the following reasons:

Respondent's attorney has had a number of State and Federal matters to attend to including the following:

1. Draft of and submission of Proposed Order Granting Partial Summary Judgment in Jerry Buck Inman v. State (Capital PCR) submitted Monday, August 8, 2016, to Judge

Macaulay;

2. State v. Kadrin Rajun Singleton (Murder) (FBOR) filed August 4, 2016 in the Court of Appeals;
3. Inman v. State (Capital PCR) Status Conference and Hearing on State's Motion for *In Camera* Inspection of Discovery and State's Motion for Partial Summary Judgment, hearing held July 26, 2016 in Newberry before Judge Macaulay;
4. State v. Antonio Miller (Murder, Burglary 1st, Kidnapping) (Petition for Writ of Certiorari to the U.S. Supreme Court) in process;
5. Freddie Owens v. Warden (Capital Federal Habeas) Response in Opposition to Motion to Stay Federal Habeas Proceedings to Exhaust State Remedies, filed Monday, August 8, 2016;
6. State v. Luzenski Cottrell (Murder/Capital Appeal) (IBOR) in process;
7. Leroy Brown v. Warden (Federal Habeas Matter) Respondent's Reply to Objections to Report and Recommendation, filed August 1, 2016;
8. Kareem Wiley v. Warden (Federal Habeas Matter) Respondent's Objection to the Report and Recommendation filed August 3, 2016;
9. Stanley Golson v. Warden (Federal Habeas Matter) Respondent's Reply to Petitioner's Response to Motion for Summary Judgment, filed July 29, 2016;
10. Ivey v Warden (Federal Habeas Matter) Reply to Response to Motion for Summary Judgment, filed July 14, 2016;

and, other matters.

Respondent has consulted with opposing counsel, Meliah Jefferson, and she does not oppose the 20-day extension request. Respondent has not previously requested a 20-day

extension from this Court in this matter. A law clerk is assisting Respondent's attorney with the brief to insure timely completion. For extraordinary circumstances shown, Respondent requests this Court grant it a twenty (20) day extension to file the Brief of Respondent in this matter.

Respectfully submitted,

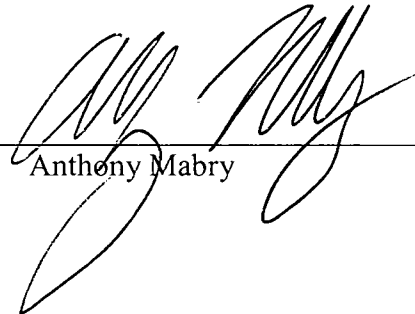
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By:



Anthony Mabry

August 10, 2016

CERTIFICATE OF SERVICE

I, **Anthony Mabry**, hereby certify that I have served the Motion for Extension of Time to File Brief of Respondent in the foregoing action by depositing copy in the United States Mail to :

Meliah Bowers Jefferson, Esquire
WYCHE, P.A.
44 East Camperdown Way
Greenville, SC 29601

And by InterAgency Mail to:

Robert M. Dudek
Chief Attorney
Division of Appellate Defense
1330 Lady, Street, Ste. 401
Columbia, SC 29201

This 10th day of August, 2016.

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ANTHONY MABRY
Assistant Attorney General