

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM PICKENS COUNTY  
John C. Hayes, III, Circuit Court Judge

Appellate Case No. 2015-001185

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**RECEIVED**

AUG 22 2016

SC Court of Appeals

THE STATE,

Respondent,

v.

JONATHAN MATTHEW HOLDER,

Appellant.

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**MOTION FOR THIRD EXTENSION OF TIME WITHIN WHICH  
TO SERVE AND FILE INITIAL BRIEF OF RESPONDENT  
AND DESIGNATION OF MATTER**

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Respondent (“the State”), through its undersigned counsel, would respectfully show unto the Court as follows:

**I.**

The Initial Brief of Respondent and Designation of Matter are due to be served and filed on today’s date, August 22, 2016.

**II.**

Pursuant to RE: Extension Requests in Criminal Direct Appeals and Post-Conviction Relief Certiorari Proceedings: Order of the South Carolina Supreme Court dated March 18, 2009, the State moves for a **third** extension in the above-referenced criminal appeal and asks for an additional thirty days to complete the brief in this case. In the past few weeks, the undersigned has submitted a Return to Petition for a Writ of Certiorari in State v. Jeffrey Davis to the South

Carolina Supreme Court. Additionally, the undersigned has submitted an Initial Brief of Respondent in State v. Wayne Beecher Carter, and Initial Brief of Respondent in State v. Gary Curtis Fraley, an Initial Brief of Appellant in State v. John Kenneth Massey, Jr., and Initial Brief of Respondent in State v. Keith Christopher Osborne, to this Court. Additionally, the undersigned has submitted various lower court orders to the circuit court regarding pending post-conviction relief matters.

### III.

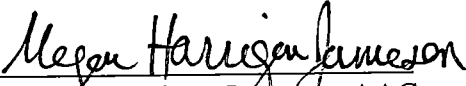
This extension request is not intended for purposes of delay, but rather to ensure that the Brief is properly researched and prepared. The Brief in the above case has required substantial research because the case involves a significant issue on appeal. The undersigned is currently working on the Brief in this case and hopes to have it completed in a timely manner. The State would therefore request an extension of time within which to serve and file the Brief.


**WHEREFORE**, the State prays that the Court extend the deadline for the service and filing of the Initial Brief of Respondent and Designation of Matter in this case for thirty days from the date such relief is granted; hold the matter in abeyance pending a ruling on the State's motion; and grant such other and further relief as the Court may deem just and proper.

Respectfully submitted,

ALAN WILSON  
Attorney General

MEGAN HARRIGAN JAMESON  
Assistant Attorney General  
S.C. Bar 100108

By:   
Megan Harrigan Jameson, AAG

By:   
\_\_\_\_\_  
J. Benjamin Aplin, SADAG  
Office of the Attorney General  
Post Office Box 11549  
Columbia, SC 29211  
(803) 734-3727

August 22, 2016

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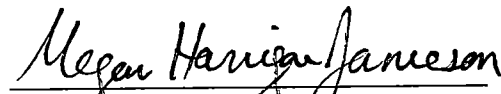
**PROOF OF SERVICE**

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I, Megan Harrigan Jameson, certify that I have served the within Motion for Third Extension of Time Within Which to Serve and File Initial Brief of Respondent and Designation of Matter on Appellant by depositing two copies of the same in the United States mail, postage prepaid, addressed to:

David Alexander, Esquire  
S.C. Commission on Indigent Defense  
Division of Appellate Defense  
P.O. Box 11589  
Columbia, South Carolina 29211

I further certify that all parties required by Rule to be served have been served.  
This 22nd day of August, 2016.

  
MEGAN HARRIGAN JAMESON  
Assistant Attorney General

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



ALAN WILSON  
ATTORNEY GENERAL

RECEIVED

AUG 22 2016

August 22, 2016

SC Court of Appeals

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

RE: State v. Jonathan Matthew Holder – Appellate Case No. 2015-001185

Dear Ms. Kitchings:

Enclosed please find the original and six copies of the Motion for Third Extension of Time within Which to Serve and File Initial Brief of Respondent and Designation of Matter, along with proof of service, for filing in the above-referenced appeal.

Sincerely,

Megan Harrigan Jameson  
Assistant Attorney General  
S.C. Bar Number 100108

MHJ/  
Enclosures

cc: David Alexander, Esquire  
Victim Services