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5th RIB due 8/31/16  
New due date 9/30/16

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

**RECEIVED**  
AUG 31 2016  
SC Court of Appeals

Appeal from Colleton County  
The Honorable Perry Buckner, Circuit Court Judge  
Appellate Case No. 2015-001447

THE STATE,

Respondent,

v.

TAQUAN L. BROWN,

Appellant.

**MOTION FOR A FIFTH AND FINAL EXTENSION TO FILE  
INITIAL BRIEF OF RESPONDENT AND DESIGNATION OF MATTER**

Respondent, State of South Carolina, hereby moves for a fifth and final 30-day extension of time to file the Initial Brief of Respondent and Designation of Matter to be included in the Record on Appeal. In support of this motion, Respondent submits the following:

1. The Initial Brief of Respondent and Designation of Matter are due to be filed and served August 31, 2016, pursuant to a Motion for a Fourth Extension related to the need to review 29 trial exhibits scheduled for pickup from the Clerk of Court for Colleton County by the Attorney Generals' office on August 2, 2016. The undersigned received and reviewed the exhibits and has determined some of them are significant to the issues raised by Appellant.

2. Respondent now requests a fifth and final 30-day extension to serve and file these documents which is not made for the purpose of delay, but due to counsel's

significant absences from the office due to a work related injury. Counsel continues to be on a medically required work restriction, and is only able to work a few hours per day when possible.

3. Counsel has worked on the Initial Brief and Designation in this matter, but was not able to complete the brief prior to the due date. Counsel assures the Court completion of this brief is a high priority, and she will work diligently to complete it.

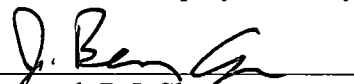
4. The undersigned consulted with counsel for the Appellant, and she is authorized to advise the Court that counsel for the Appellant consents to the requested relief.

Based on the foregoing, Respondent respectfully requests that this Court grant a fifth and final 30-day extension in which to file the Initial Brief of Respondent and Designation of Matter, and that all deadlines be held in abeyance pending resolution of this motion.

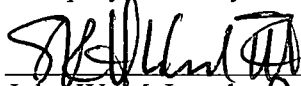
Respectfully submitted,

ALAN WILSON  
Attorney General

DEBORAH R.J. SHUPE  
Senior Assistant Deputy Attorney General

BY:   
*for* Deborah R.J. Shupe

JOHN W. McINTOSH  
Chief Deputy Attorney General

By:   
John W. McIntosh *for Ch. Dep.*

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

ATTORNEYS FOR RESPONDENT

August 31, 2016

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

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Appeal from Colleton County  
The Honorable Perry Buckner, Circuit Court Judge  
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SC Court of Appeals

THE STATE,

Respondent,

v.

TAQUAN L. BROWN,

Appellant.

\_\_\_\_\_  
**PROOF OF SERVICE**  
\_\_\_\_\_

I, Sally Ellison, certify that I have served the Motion for a Fifth and Final Extension to File Initial Brief of Respondent and Designation of Matter, on Appellant by depositing a copy of same in the United States Mail, postage prepaid addressed to:

John H. Strom, Esquire  
S.C. Commission on Indigent Defense  
Division of Appellate Defense  
Post Office Box 11589  
Columbia, South Carolina 29211

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

This 31st day of August, 2016

  
SALLY ELLISON

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



ALAN WILSON  
ATTORNEY GENERAL

August 31, 2016

**RECEIVED**

AUG 31 2016

SC Court of Appeals

**VIA HAND-DELIVERY**

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

Re: The State v. Taquan L. Brown  
Appellate Case No. 2015-001447

Dear Ms. Kitchings:

Enclosed please find the original and six (6) copies of a Motion for a Fifth and Final Extension to File Initial Brief of Respondent and Designation of Matter, along with proof of service for filing, in the above-referenced appeal.

Sincerely,

*DRJS* Deborah R.J. Shupe  
Senior Assistant Deputy Attorney General

DRJS/sbe  
Enclosures

cc: John S. Strom, Esquire (w/enclosure)  
Victim Services (w/enclosure)