

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Lancaster County  
Honorable Brian M. Gibbons, Circuit Court Judge

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RECEIVED

MAY 25 2017

SC Court of Appeals

THE STATE,

Respondent,

v.

JOHN MARION GHENT, JR.,

Appellant

Appellate Case No. 2016-000643.

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

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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 to complete 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 return, memorandum of law, and responses to two (2) additional *pro se* pleadings in another federal habeas action (*Makandi Terry*); and prepared for and delivered oral argument in this Court in a non-capital murder appeal (*State v. Odom Bryant*). Also, undersigned counsel has been completing work on an additional initial brief of respondent in another non-capital murder appeal which is presently due Friday, May 26, 2017, and which

has been granted three extensions of time for completion. (*State v. John Sledge*).

2. Due to her case load, undersigned counsel for Respondent has substantially completed, but has been unable to perfect, the initial brief in this appeal in a timely fashion. Counsel requests the additional time in order to do so.

3. 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

J. ROBERT BOLCHOZ  
Chief Deputy Attorney General

DONALD J. ZELENKA  
Deputy Attorney General

CAROLINE M. SCRANTOM  
Assistant Attorney General

BY: 

CAROLINE M. SCRANTOM  
S.C. Bar No. 101357  
Office of the Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29211  
(803) 734-6305

May 25, 2017  
Columbia, South Carolina

ATTORNEYS FOR RESPONDENT

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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PROOF OF SERVICE

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I, Caroline M. Scrantom, 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 M. Dudek, Chief Appellate Defender  
South Carolina Commission on Indigent Defense  
Division of Appellate Defense  
Post Office Box 11589  
Columbia, South Carolina 29211-1589

This 25th day of May, 2017.

  
CAROLINE M. SCRANTOM

S.C. Bar No. 101357  
Office of Attorney General  
Post Office Box 11549  
Columbia, SC 29211  
(803) 734-6305

ATTORNEY FOR RESPONDENT



ALAN WILSON  
ATTORNEY GENERAL

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MAY 25 2017

SC Court of Appeals

May 25, 2017

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


Re: The State vs. John Marion Ghent Jr.  
Appellate Case No. 2016-000643

Dear Ms. Kitchings:

Enclosed for filing are the original and six (6) copies of the Respondent's Second Extension of Time to File Initial Brief of Respondent, together with Proof of Service, in the above-referenced matter. I am informing opposing counsel of my request by copy of this letter.

Thank you for your assistance in this matter.

Sincerely,

  
Caroline M. Scrantom  
Assistant Attorney General

CS/csm

Enclosures

cc: Robert M. Dudek (w/two copies of encls.)