

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

---

Appeal from Darlington County  
Honorable Roger E. Henderson, Circuit Court Judge

---

THE STATE,

Respondent,

v.

JOEY LATWAN GIBSON,

Appellant

Appellate Case No. 2016-001585.

---

RECEIVED  
JUN 26 2017  
SC Court of Appeals

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

---

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 the following: written and filed a brief of Respondent-Appellee in the Fourth Circuit Court of Appeals (*Anthony Odom v. Jerry Adger*); prepared and filed a return and memorandum of law in a federal habeas corpus action (*D'Andrick Breaker*); prepared and filed responses to additional *pro se* pleadings in three (3) other federal habeas actions (*Richard Ratliff*, *Dayquan Robinson*, *Jaques Sullivan*); prepared and filed an initial brief of respondent in a non-capital murder appeal in this Court (*State v. John*



*Sledge*); prepared and filed a final brief of respondent in another non-capital murder appeal in this Court (*State v. Trey Brown*); and prepared and filed a return in a Lexington County post-conviction relief action (*Richard Boatwright v. State*). Also, undersigned counsel is completing and filing an additional initial brief of respondent in another non-capital murder appeal which is presently due today, May 26, 2017, and which has been granted two extensions of time for completion. (*State v. John Ghent, Jr.*).

2. Due to her case load, undersigned counsel for Respondent has been unable to complete the initial brief of respondent 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.

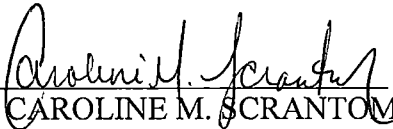
Respectfully submitted,

ALAN WILSON  
Attorney General

DONALD J. ZELENKA  
Deputy Attorney General

MELODY J. BROWN  
Senior Assistant 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

June 26, 2017  
Columbia, South Carolina

(803) 734-6305

ATTORNEYS FOR RESPONDENT

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

---

Appeal from Darlington County  
Honorable Roger E. Henderson, Circuit Court Judge

---

THE STATE,

Respondent,

v.

JOEY LATWAN GIBSON,

Appellant

Appellate Case No. 2016-001585.

---

PROOF OF SERVICE

---

RECEIVED

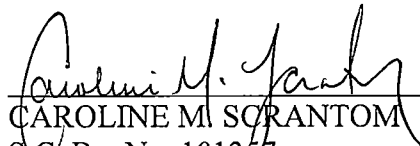
JUN 26 2017

SC Court of Appeals

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:

John H. Strom, Appellate Defender  
South Carolina Commission on Indigent Defense  
Division of Appellate Defense  
Post Office Box 11589  
Columbia, South Carolina 29211-1589

This 26th day of June, 2017.

  
CAROLINE M. SCRANTOM  
S.C. Bar No. 101397  
Office of Attorney General  
Post Office Box 11549  
Columbia, SC 29211  
(803) 734-6305

ATTORNEY FOR RESPONDENT



ALAN WILSON  
ATTORNEY GENERAL

June 26, 2017

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

RECEIVED

JUN 26 2017

SC Court of Appeals


Re: Joey Latwan Gibson  
C/A #: 2016-001585

Dear Ms. Kitchings:

Enclosed for filing are the original and six copies of the Respondent's Second *Second Extension of Time to File Initial Brief of Respondent and Designation of Matter*, accompanied by 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. Scramton  
Assistant Attorney General

CMS:csm  
Enclosures  
cc: John H. Strom, Esquire (w/two copies of encls.)