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3rd IEB due 7/14/17

**STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

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Appeal from Berkeley County  
The Honorable Deadra L. Jefferson, Circuit Court Judge  
  
Appellate Case No. 2016-001519

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THE STATE,

Respondent,

vs.

**RECEIVED**  
  
JUL 14 2017  
**SC Court of Appeals**

LEE DELL BRADLEY,

Appellant.

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

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The undersigned counsel would respectfully request a thirty (30) day extension in which to file the Initial Brief of Respondent in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following:

Respondent's Initial Brief is due today, July 14, 2017, upon this Court's grant of Respondent's second request for an extension filed on June 16, 2017.

The undersigned attorney for the Respondent has had a number of state and federal matters to attend since June 14, 2017. Specifically,

1. Counsel prepared the Return and Memorandum of Law in Support of Motion for Summary Judgment in the matter of James Allen Moore, a/k/a James Allen Moore, a/k/a Jabari Abdul-Mubarak vs. Scott Davis, Warden, C/A No.: 9:17-632-BHH-BM on June 16, 2017;

2. Counsel filed a Response in Support of Motion to Lift Stay and for Scheduling Order in the matter of Richard Bernard Moore vs. Bryan P. Stirling Commissioner, et al., C/A No. 4:14-04691-MGL-TER, a Spartanburg County capital matter now pending in the United States District Court for the District of South Carolina on June 21, 2017;

3. Counsel filed a Return and Motion to Dismiss in the Lexington County Post-Conviction Relief matter of Theodore Davis, Jr., #217549 vs. The State of South Carolina, 2017-CP-32-01457 on June 26, 2017;

4. Counsel filed a Response to Petitioner's Reply to Motion for Summary Judgment in the matter of Leo David Lemire, #337634 vs. John R. Pate, C/A No. 0:16-4025-DCN-PJG on July 6, 2017;

5. Counsel filed a Return and Motion to Dismiss in the Saluda County Post-Conviction Relief matter of Jack Harrison, Jr. v. State of South Carolina, 2014-CP-41-121 on July 11, 2017;

6. Counsel is currently preparing the Order of Dismissal in the Charleston County Post-Conviction Relief matter of David Meggett v. State of South Carolina, 2013-CP-10-3740. Counsel was not present at the hearing, but has been assigned to review the transcripts in this matter and prepare the Order therefrom; and

7. Counsel has also been reviewing matters due to his involvement in the Office of the Attorney General's Appellate Decision Review Committee. The Committee was formed to

review all adverse decisions in Capital, Federal Habeas, Direct Appeals, and Post-Conviction relief matters, and to determine whether the State will appeal these rulings.

However, due to counsel's involvement in these and other matters pending in state and federal court, counsel is unable to timely complete the Initial Brief of Respondent in this proceeding. Thus, counsel is requesting an extension of time in which to file the Initial Brief in this matter. This request is made in good faith, and not for the purposes of delay.

WHEREFORE, premises considered, counsel hereby respectfully requests a thirty (30) day extension of time to serve and file the Initial Brief of Respondent and Designation of Matter.

Respectfully submitted,

ALAN WILSON  
Attorney General

DONALD J. ZELENKA  
Deputy Attorney General  
ID No. 5758

MELODY J. BROWN  
Senior Assistant Deputy Attorney General

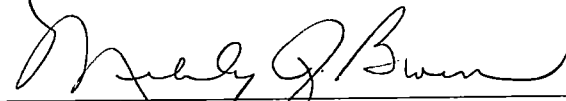
WILLIAM EDGAR SALTER, III  
Senior Assistant Attorney General  
ID No. 4806

By:

  
WILLIAM EDGAR SALTER, III

ATTORNEYS FOR RESPONDENT

I support the finding of good cause.



Melody J. Brown, Senior Assistant Deputy Attorney General

July 14, 2017.

**STATE OF SOUTH CAROLINA**  
**IN THE COURT OF APPEALS**

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Appeal from Berkeley County  
The Honorable Deadra L. Jefferson, Circuit Court Judge

Appellate Case No. 2016-001519

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THE STATE,

vs.

LEE DELL BRADLEY,

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Appellant.

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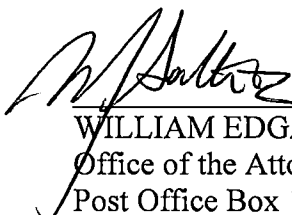
**PROOF OF SERVICE**

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I, William E. Salter, III, of counsel for the Respondent, certify that I have served two (2) copies of the within motion for a third extension to file Initial Brief of Respondent and Designation of Matter via U.S. mail to his attorney of record, David Alexander, Esq., SCCID/Division of Appellate Defense, 1330 Lady Street, Suite #401, Columbia, South Carolina 29201-3332.

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

This 14<sup>th</sup> day of July, 2017.

  
\_\_\_\_\_  
WILLIAM EDGAR SALTER, III  
Office of the Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29211  
(803) 734-6305

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ALAN WILSON  
ATTORNEY GENERAL

July 14, 2017

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

RECEIVED  
JUL 14 2017  
SC Court of Appeals

Re: *The State v. Lee Dell Bradley*  
Appeal from Berkeley County  
Appellate Case No. 2016-001519

Dear Ms. Kitchings:

I hereby request an extension of thirty (30) days in which to file the Initial Brief of Respondent and Designation of Matter in the above-referenced case. The Initial Brief is currently due to be served and filed today, July 14, 2017. However, because of my involvement in other matters in state and federal court, I have been unable to timely complete the Initial Brief.

Therefore, I am enclosing an original and six (6) copies of a Motion for Third Extension to File Initial Brief of Respondent and Designation of Matter. I am advising counsel for Appellant by copy of this letter.

Sincerely,

William Edgar Salter, III  
Senior Assistant Attorney General

WES/dmd  
Enclosures

cc: David Alexander, Esq. (w/two copies of encls.)