

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

**RECEIVED**

JUL 06 2018

Appeal from Greenville County  
Honorable Robin B. Stilwell, Circuit Court Judge  
Appellate Case Tracking No. 2015-001097

SC Court of Appeals

The State,

Respondent,

vs.

Terry Edward McCall,

Appellant.

**MOTION FOR FOURTH EXTENSION  
WITHIN WHICH TO SERVE AND FILE  
INITIAL BRIEF OF RESPONDENT**

Respondent, through its undersigned counsel, would respectfully show unto this Court:

I.

The Initial Brief of Respondent is due to be served and filed July 6, 2018.

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 Respondent moves for a fourth extension in the above referenced appeal. Due to work required in other cases pending before this Court and the South Carolina Supreme Court, I am unable to complete this brief on time. The undersigned has completed a Briefs of Respondent in State v. Pradubsri, State v. Moore, State v. Dial, and State v. Kelly. Additionally, the undersigned prepared for and participated in oral argument in the complex and significant case of

State v. Smith. As a result, the undersigned has been unable to complete the Initial Brief of Respondent addressing Appellant's four issue brief in which several issues present significant legal questions.

III.


This extension request is not intended for purposes of delay, but rather to ensure the Brief is properly researched and prepared. The undersigned is currently working on this Brief and anticipates it will be completed without need for any further extensions from the Court. I would, therefore, request a fourth extension of time within which to serve and file the Initial Brief of Respondent.


WHEREFORE, Respondent prays that the Court hold this matter in abeyance until ruling on this motion, and extend the deadline for the service and filing of the Initial Brief of Respondent in this case for thirty (30) days from the date such relief is granted; and for such other and further relief as the Court may deem just and proper.

Respectfully submitted,

ALAN WILSON  
Attorney General

WILLIAM M. BLITCH, JR.  
Senior Assistant Attorney General

  
W. JEFFREY YOUNG  
Chief Deputy Attorney General

  
WILLIAM M. BLITCH, JR.  
Senior Assistant Attorney General  
S.C. Bar No. 15608

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

ATTORNEYS FOR RESPONDENT

July 6, 2018

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The State,

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Appellant.


**PROOF OF SERVICE**

I, Anne A. Mueller, certify that I have served the Motion For Fourth Extension Of Time Within Which To Serve And File Initial Brief of Respondent on Appellant by depositing a copy of same in the United States mail, postage prepaid, addressed to:

Lara M. Caudy, Esquire  
SC Commission on Indigent Defense  
Division of Appellate Defense  
Post Office Box 11589  
Columbia, South Carolina 29211-1589

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

This 6<sup>th</sup> day of July, 2018.

  
\_\_\_\_\_  
ANNE A. MUELLER  
Office of Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29211  
(803) 734-3727



ALAN WILSON  
ATTORNEY GENERAL

July 6, 2018

**VIA HAND DELIVERY**

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

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JUL 06 2018

SC Court of Appeals

Re: State v. Terry Edward McCall  
Appellate Case Tracking No: 2015-001097

Dear Ms. Kitchings:

Enclosed please find the original and six (6) copies of a Motion For Fourth Extension Of Time Within Which To Serve And File Initial Brief of Respondent along with proof of service for filing in the above-referenced appeal.

Sincerely,

William M. Blich, Jr.  
Assistant Attorney General  
S.C. Bar No. 15608

Enclosures

cc: Lara M. Caudy, Esquire  
Victim Advocacy Division