

THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

CERTIORARI TO AIKEN COUNTY
The Honorable Doyet A. Early, III Trial Judge
The Honorable Robert E. Hood, Post-Conviction Relief Judge

Appellate Case No: 2016-002458

ANTHONY MARQUISE MARTIN,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT.

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

Respondent (the State), through its undersigned counsel, would respectfully show unto the Court as follows:

I.

The Brief of Respondent in the above-captioned post-conviction relief appeal is due to be served and filed today, November 16, 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, Respondent moves for a **fourth** extension in the above-referenced post-conviction relief appeal and asks for an additional thirty days to complete the brief in this case due to a significant workload.

RECEIVED
NOV 16 2018
S.C. SUPREME COURT

Undersigned counsel, in addition to her own caseload and supervisory duties over the post-conviction relief unit of the Attorney General's Office, has also been managing the caseload of two vacant circuit assignments due to recent departures from the Attorney General's Office. Undersigned counsel was just added as counsel of record for this case on October 30, 2018, when the former counsel of record, Julie A. Coleman, left the office to enter private practice, and counsel needs additional time to familiarize herself with this case and adequately prepare the brief.


Additionally, over the past six weeks, undersigned counsel has appeared in court in the Eighth Circuit, Ninth Circuit, Eleventh Circuit, and Thirteenth Circuit for evidentiary hearings, as well as submitted numerous circuit court filings statewide. This extension request is not intended for any delay, but is due to a significant workload.

III.

This extension request is not intended for purposes of delay, but rather to ensure the brief is properly researched and prepared. The brief in the above case has required significant research because the case involves significant issues on appeal. The undersigned is currently working on the brief in this case and hopes to have it completed in a timely manner. Therefore, undersigned counsel request an extension of time within which to serve and file the brief.

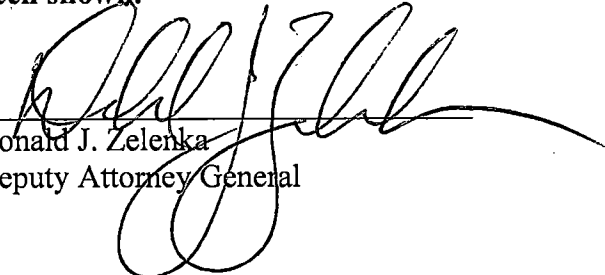
WHEREFORE, Respondent prays the Court extend the deadline for the service and filing of the Brief of Respondent in this case for thirty days from the date such relief is granted; hold the matter in abeyance pending a ruling on Respondent's motion; and grant such other and further relief as the Court may deem just and proper.

Respectfully submitted,


Meghan Harrigan Jameson
Senior Assistant Deputy Attorney General
S.C. Bar No. 100108


Office of the Attorney General
Post Office Box 11549
Columbia, South Carolina 29211
(803) 734-3737
Attorney for Respondent

I concur that extraordinary circumstances have been shown.


Donald J. Zelenka
Deputy Attorney General

This 16th day of November, 2018.

I consent.


David Alexander
Appellate Defender

THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

CERTORIARI TOAIKEN COUNTY
The Honorable Doyet A. Early, III Trial Judge
The Honorable Robert E. Hood, Post-Conviction Relief Judge

Appellate Case No: 2016-002458

ANTHONY MARQUISE MARTIN,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

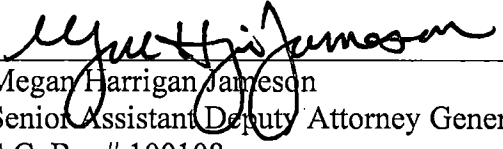
RESPONDENT.

CERTIFICATE OF SERVICE

I, Megan Harrigan Jameson, hereby certify that I have served the Motion for Fourth Extension to file the Brief of Respondent on Petitioner by depositing a copy of same in interagency mail to:

David Alexander, Esquire
SC Commission of Indigent Defense
Post Office Box 11589
Columbia, SC 29201

I further certify that all parties required by Rule to be served have been served.
This 16th day of November, 2018



Megan Harrigan Jameson
Senior Assistant Deputy Attorney General
S.C. Bar # 100108
Office of the Attorney General
Post Office Box 11549
Columbia, South Carolina 29211
(803) 734-3737
ATTORNEY FOR RESPONDENT



ALAN WILSON
ATTORNEY GENERAL

November 16, 2018

RECEIVED
NOV 16 2018
S.C. SUPREME COURT

The Honorable Daniel E. Shearouse
Clerk of Court — SC Supreme Court
Post Office Box 11330
Columbia, South Carolina 29211

Re: Anthony Marquise Martin v. State of South Carolina
Appellate Case No.: 2016-002458
Lower Court Case: 2015-CP-02-649

Dear Mr. Shearouse:

Enclosed please find the original and six copies of the **Motion for Fourth Extension to Serve and File Brief of Respondent**, in the above matter for filing in your office. By copy of this letter, I am serving opposing counsel with this Motion today.

Sincerely,

Megan Harrigan Jameson
Senior Assistant Deputy Attorney General
SC Bar # 100108

MHJ/ks
Enclosures

cc: David Alexander, Esquire