

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

Appeal From Berkley County  
The Honorable Maite Murphy, Circuit Court Judge  
Appellate Case No. 2017-002130

**RECEIVED**  
NOV 27 2018  
SC Court of Appeals

THE STATE,

RESPONDENT,

vs.

RANDY WRIGHT,

APPELLANT.

**MOTION TO FILE INITIAL BRIEF OF RESPONDENT  
AND DESIGNATION OF MATTER OUT OF TIME AND MOTION FOR AN  
ADDITIONAL 30 DAYS TO RESPOND**

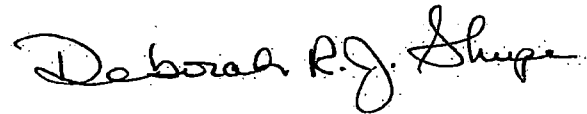
Respondent, through its undersigned attorney, would respectfully show as follows:

1. The Initial Brief of Respondent and Designation of Matter was due to be served and filed November 26, 2018.
2. As a result of the calendaring error, the Respondent respectfully requests it be allowed to file the Initial Brief of Respondent and Designation of Matter out of time and for an additional 30 days within which to serve and file the Respondent's Initial Brief and Designation of Matter. This request is not intended for the purpose of delay, and the Respondent does not believe this request will result in any prejudice to the Appellant should this Motion be granted.
3. The undersigned has consulted with counsel for the Appellant, and she is authorized to advise the Court that counsel consents to the requested relief.

Based on the foregoing, Respondent respectfully requests this Court hold this matter in abeyance pending a resolution of this motion, and grant the Respondent the requested relief.

ALAN WILSON  
Attorney General

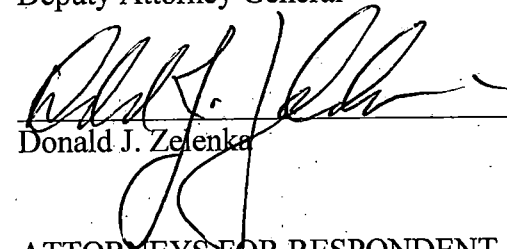
DEBORAH R.J. SHUPE  
Senior Assistant Deputy Attorney General  
SC Bar No. 5098



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Deborah R.J. Shupe

DONALD J. ZELENKA  
Deputy Attorney General



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ATTORNEYS FOR RESPONDENT  
Office of the Attorney General  
Post Office Box 11549  
Columbia, SC 29211  
(803) 734-3970

November 27, 2018

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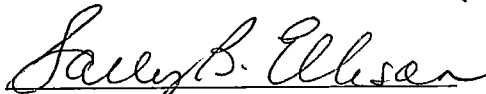
**PROOF OF SERVICE**

I, Sally Ellison, certify I served and filed the Motion to File Initial Brief of Respondent and Designation of Matter Out of Time and For An Additional 30 Days to Respond, by depositing a copy in the United States mail, postage prepaid, addressed to:

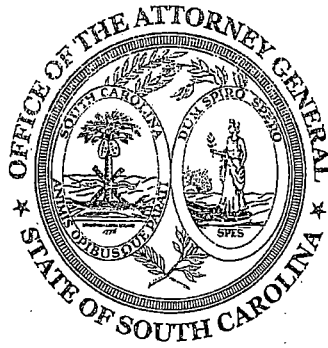
Joanna Delany, Esquire  
Assistant Appellate Defender  
South Carolina Commission on Indigent Defense  
Division of Appellate Defense  
PO Box 11589  
Columbia, SC 29211-1589

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

This 27th day of November.



SALLY B. ELLISON  
Administrative Assistant  
Office of Attorney General  
Post Office Box 11549  
Columbia, SC 29211  
(803) 734-3727



ALAN WILSON  
ATTORNEY GENERAL

November 27, 2018

**HAND-DELIVERY**

The Honorable Jenny A. Kitchings  
Clerk, SC Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

Re: The State v. Randy Wright  
Appellate Case No. 2017-002130

Dear Ms. Kitchings:

Enclosed for filing are an original and seven (7) copies of a Motion to Serve and File Initial Brief of Respondent and Designation of Matter Out of Time and For An Additional 30 days to Respond, with Proof of Service.

Sincerely yours,

Deborah R.J. Shupe  
Senior Assistant Deputy Attorney General

DRJS/se  
Enclosures

cc: Joanna K. Delany, Esquire (w/enclosures)  
Victim Advocacy Division

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