

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Charleston County  
The Honorable Paul M. Burch, Circuit Court Judge

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THE STATE OF SOUTH CAROLINA,

RESPONDENT,

V.

ANTWON D. GOODWIN,

APPELLANT,

Appellate Case No. 2018-000144

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

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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 for a number of state and federal matters in the last thirty (30) days, including the following: a) prepared and filed an Initial Brief of Respondent in the South Carolina Court of Appeals (*Samuel T. Collins*); b) prepared and filed a Reply to Petitioner's Response in Opposition to Second Motion for Summary Judgment in district court (*Bobby Barton*); c) prepared and filed an Initial Brief of Respondent in the South Carolina Court of Appeals (*James Heyward*); d) prepared and filed a Reply to Objection to Report and Recommendation in a capital case in district court (*John*

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*Wood*); e) prepared and filed a Reply to Objections to the Report and Recommendation in one federal habeas action in district court (*Randy Mitchell*); f) prepared and filed a Motion for Summary Judgment and Return and Memorandum of Law in Support of Motion in district court (*Wilfredo Salas*); g) prepared for and represented the State in one post-conviction relief matter, including the preparation of the order of dismissal in circuit court (*Matthew Dwyer*); and h) and prepared and will present oral argument before the South Carolina Court of Appeals on December 5, 2018 (*Edward Bonilla*).

2. Respondent has contacted opposing counsel concerning this motion for a second extension of time, and counsel does not object.

3. Due to her case load, undersigned counsel for Respondent has not been able, in a timely fashion, to complete the initial brief in this appeal and would request the additional time in order to do so.

4. 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,

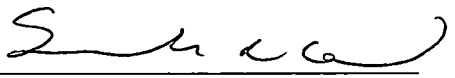
ALAN WILSON  
Attorney General

DONALD J. ZELENKA  
Deputy Attorney General

MELODY J. BROWN  
Senior Assistant Deputy Attorney General

SUSANNAH R. COLE  
Assistant Attorney General

December 5, 2018  
Columbia, South Carolina

BY: 

SUSANNAH R. COLE  
SC Bar No. 68383  
Office of the Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29211  
(803) 734-6305

ATTORNEYS FOR RESPONDENT

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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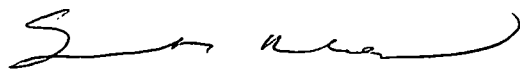
**CERTIFICATE OF SERVICE**

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I, Susannah R. Cole, certify that I have served Respondent's Motion for a Second Extension of Time on counsel for Appellant, by depositing two copies of same in the United States mail, postage prepaid, to counsel for appellant, addressed as follows:

Jeremy A. Thompson, Esq.  
Law Office of Jeremy A. Thompson, LLC  
P.O. Box 1834  
Irmo, SC 29063

This 5th day of December, 2018

  
\_\_\_\_\_  
Susannah R. Cole  
Assistant Attorney General  
Office of Attorney General  
Post Office Box 11549  
Columbia, SC 29211  
(803) 734-6305

ATTORNEY FOR RESPONDENT

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ALAN WILSON  
ATTORNEY GENERAL

December 5, 2018

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

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SC Court of Appeals

Re: The State vs. Antwon D. Goodwin  
Appellate Case No. 2018-000144

Dear Ms. Kitchings:

Enclosed for filing are the original and six (6) copies of the Respondent's Second Extension of Time to File Initial Brief of Respondent, together with 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,

Susannah R. Cole  
Assistant Attorney General

SC/ams  
Enclosures

cc: Jeremy A. Thompson, Esq. (w/two copies of encls.)  
Victim Advocacy Division (w/ copies of encls.)