

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
JAN 02 2019
SC Court of Appeals

THE STATE,

RESPONDENT,

vs.

RANDY WRIGHT,

APPELLANT.

**MOTION FOR FOURTH EXTENSION TO SERVE AND FILE
INITIAL BRIEF OF RESPONDENT AND DESIGNATION OF MATTER**

Respondent, State of South Carolina, hereby moves for a fourth extension of time to file the Initial Brief of Respondent and Designation of Matter to be included in the Record on Appeal. In support of this motion, Respondent submits the following:

1. The Initial Brief of Respondent and Designation of Matter are due to be filed and served January 2, 2019, pursuant to a third extension request. Respondent requests a fourth 30-day extension to serve and file these documents, which is not made for the purpose of delay but due to a heavy workload. In addition, counsel is on a medically required work restriction which limits the amount of work hours she is allowed to work per day. Further, the Attorney General's office has been closed due to the State Christmas and New Years' Holidays.

2. Counsel has worked on the Initial Brief and Designation in this matter, but is unable to complete the brief prior to the due date. Counsel assures the Court completion of this brief is a high priority, and she will work diligently to complete it.

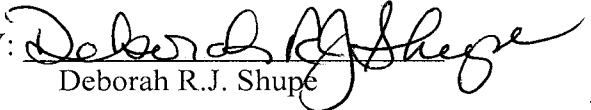
3. The undersigned consulted with counsel for the Appellant, and she is authorized to advise the Court counsel consents to the requested relief.

Based on the foregoing, Respondent respectfully requests this Court grant a fourth 30-day extension in which to file the Initial Brief of Respondent and Designation of Matter, and that all deadlines be held in abeyance pending resolution of this motion.

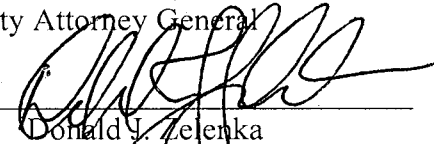
Respectfully submitted,

ALAN WILSON
Attorney General

DEBORAH R.J. SHUPE
Senior Assistant Deputy Attorney General

BY: 
Deborah R.J. Shupe

DONALD J. ZELENKA
Deputy Attorney General

BY: 
Donald J. Zelenka

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

ATTORNEYS FOR THE RESPONDENT

January 2, 2019

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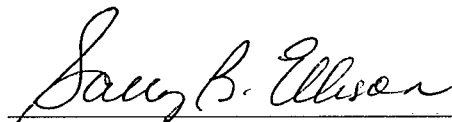
PROOF OF SERVICE

I, Sally Ellison, certify I served and filed the Motion for Fourth Extension to File Initial Brief of Respondent and Designation of Matter, 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 2nd day of January 2019.



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



ALAN WILSON
ATTORNEY GENERAL

January 2, 2019

HAND-DELIVERY

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

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SC Court of Appeals

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 for Fourth Extension to Serve and File Initial Brief of Respondent and Designation of Matter.

By copy of this correspondence, I am serving counsel for the Appellant with a copy of the Respondent's Motion.

Sincerely yours,

Deborah R.J. Shupe
Senior Assistant Deputy Attorney General

DRJS/se
Enclosures

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