

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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Appeal From Pickens County  
The Honorable Perry H. Gravely, Circuit Court Judge  
Appellate Case No: 2017-002563

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**RECEIVED**  
APR 17 2019  
SC Court of Appeals

STATE OF SOUTH CAROLINA,

Respondent,

vs.

ANGELA D. BREWER,

Appellant.

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**MOTION FOR EXTENSION OF TIME**

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

I.

The Initial Brief of Respondent and Designation of Matter are due to the Court today, pursuant to a previous extension granted by the Court.

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 third extension in the above referenced appeal. Due to work required in other cases pending before this Court, I am unable to complete this Brief on time. I would therefore request an extension of time within which to serve and file the Initial Brief of Respondent and Designation of Matter. In the past few weeks, the undersigned counsel has participated in oral argument before the Court of Appeals in State v. Jamie Lee Simpson and State v. Tony Latrell

Kinard, participated in oral argument before the Supreme Court in State v. Sean Robert Kelly, submitted a Return to Petition for Writ of Certiorari in State v. Timothy Oertel, Dominique Shumate v. State, and David W. Chiles, Jr. v. State, submitted a Brief of Respondent in State v. Jamal Marquis Daniels, and submitted a Final Brief of Respondent in State v. Brendan P. Furthermore, the undersigned has been on a leave of absence following the birth of a child.

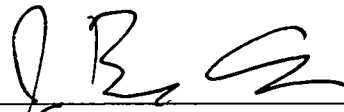
III.

This extension request is not intended for purposes of delay, but rather to ensure that the Brief is properly researched and prepared.

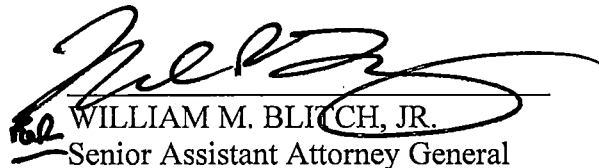
WHEREFORE, Respondent prays that the Court extend the deadline for the service and filing of the Initial Brief of Respondent and Designation of Matter in this case for thirty (30) days; and for such other and further relief as the Court may deem just and proper.

Respectfully submitted,

ALAN WILSON  
Attorney General



J. BENJAMIN APLIN  
Senior Assistant Deputy Attorney General



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

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Post Office Box 11549  
Columbia, SC 29211  
(803) 734-3727

ATTORNEYS FOR RESPONDENT

April 17, 2019

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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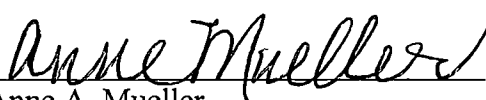
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**PROOF OF SERVICE**

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I, Anne Mueller, certify that I have served the Motion for Extension of Time on Appellant by delivering two copies of the same, addressed to her attorney of record, Susan B. Hackett, Esquire, South Carolina Commission of Indigent Defense, Division of Appellate Defense, P.O. Box 11589, Columbia, South Carolina 29211.

I further certify that all parties required by Rule to be served have been served.  
This 17<sup>th</sup> day of April, 2019.

  
Anne A. Mueller  
Legal Assistant for the Respondent

Office of Attorney General  
Post Office Box 11549  
Columbia, SC 29211  
(803) 734-3737



ALAN WILSON  
ATTORNEY GENERAL

April 17, 2019

**RECEIVED**  
APR 17 2019  
SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
Clerk of Court, South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29201

**RE: State v. Angela D. Brewer**  
Appellate Case No: 2017-002563

Dear Ms. Kitchings:

Enclosed please find the original and six (6) copies of the Motion for Extension of Time in the above matter.

Sincerely,

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

WMB/aam  
Enclosures

cc: Kathrine H. Hudgins, Esquire (w/enclosures)  
Victim Advocacy Division (w/enclosure)