

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Greenville County
Honorable Perry H. Gravely, Circuit Court Judge

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JUN 05 2019

SC Court of Appeals

Respondent,

THE STATE,

v.

JANE KATHERINE HUGHES,

Appellant

Appellate Case No. 2018-000659.

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

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 for Respondent would respectfully show unto the Court that she has been scheduled to complete a number of state and federal matters in the last thirty (30) days to include the following:

1. Drafted and filed another Initial Brief of Respondent in a non-capital murder appeal in this Court (*John Hughes v. State—May 24, 2019*);
2. Drafted and filed a Reply to the Return to the Petition for a Writ of Certiorari in another non-capital murder appeal pending certiorari in the South Carolina Supreme Court (*State v. Trey Chavez Brown—May 30, 2019*);

3. Drafted and filed a Return and Memorandum in Support of Summary Judgment in Federal Habeas Corpus action in the Federal District Court for the District of South Carolina (*Robert Singletary v. Warden—May 16, 2019*);
4. Drafted and filed other replies and/or responses required in Federal Habeas Corpus actions pending in Federal District Court for the District of South Carolina (*Tequan Brown v. Warden—May 16, 2019; Robert Singletary—May 24, 2019*);
5. Drafted and submitted proposed orders of dismissal in two non-capital post-conviction relief cases required for submission to the South Carolina Circuit Court, each pertaining to a lengthy series of allegations flowing from discrete non-capital murder trials (*Gonzales Wardlaw v. State—May 23, 2019; Curtis Johnson v. State—June 3, 2019*); and
6. Counsel is this week working to meet deadlines regarding another Return and Memorandum in Support of Summary Judgment in Federal Habeas Corpus action in the Federal District Court for the District of South Carolina which is due for completion this Friday, June 7, 2019, and has been tasked with completing another outstanding proposed order of dismissal in a non-capital post-conviction relief action heard in November 2016 which has a record totaling over 1000 pages (*Joseph Dunbar, Jr. v. Warden; Kerwin Parker v. State*).

Due to her caseload, undersigned counsel has been unable to complete the responsive brief in a timely fashion and therefore requests the additional time in order to do so.

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

CAROLINE SCRANTOM
Assistant Attorney General

BY: 
CAROLINE SCRANTOM
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ATTORNEY FOR RESPONDENT

June 5, 2019
Columbia, South Carolina

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PROOF OF SERVICE

I, Caroline Scrantom, certify that I have served Respondent's Motion for a Second Extension of Time to file Initial Brief of Respondent and Designation of Matter by depositing two (2) copies of the same in the United States mail, postage prepaid, to counsel for Appellant, addressed as follows:

Kathrine H. Hudgins, Esq.
SCCID/Division of Appellate Defense
1330 Lady Street, Suite 401
Columbia, South Carolina 29201

This 5th day of June, 2019.



CAROLINE SCRANTOM
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Post Office Box 11549
Columbia, South Carolina 29211
(803) 734-6305

ATTORNEY FOR RESPONDENT



ALAN WILSON
ATTORNEY GENERAL

June 5, 2019

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

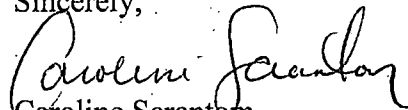
Re: *The State v. Jane Katherine Hughes*
Appeal from Greenville County
Appellate Case No. 2018-000659

Dear Ms. Kitchings:

Enclosed for filing are the original and six (6) copies of the Respondent's Second Motion for 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,


Caroline Scrantom
Assistant Attorney General

CS:dmd

Enclosures

cc: Kathrine H. Hudgins, Esq. (w/two copies of encls.)

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