

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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

THE STATE,

v.

JANE KATHERINE HUGHES,

Respondent,

Appellant

Appellate Case No. 2018-000659.

**MOTION FOR THIRD 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 which is currently due to be filed on Friday, July 5, 2019. This is Respondent's third 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 a Return and Memorandum of Law in Support of Motion for Summary Judgment in a habeas corpus action pending in the United States District Court for the District of South Carolina (*Joseph Dunbar, #348569 vs. Warden of Lieber Correctional Institution, C/A No. 9:19-829-RMG-BM —June 7, 2019*);
2. Drafted and filed the Respondent-Appellee's Response in Opposition to Petitioner-

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Appellant's Motion for Release in a Criminal Case in another habeas action pending in the United States Court of Appeals for the Fourth Circuit (*Randolph Ashford*, #256638 vs. *Michael Stephan*, Case No. 19-6518—*June 18, 2019*);

3. Drafted and filed a Response in Opposition to Motion to Amend/Correct Scheduling Order [ECF #40] in a capital habeas corpus action pending in the United States District Court for the District of South Carolina (Quincy J. Allen, #6019 v. *Willie Davis*, C/A No. 0:18-01544-DCC-PJG —*June 18, 2019*);
4. Drafted and filed the Response in Opposition to Petitioner's Motion for Evidentiary Hearing [ECF #47]; the Reply to Petitioner's Objections to the Report and Recommendation [ECF #46], and the Response in Opposition to Petitioner's Motion to Amend the Habeas Petition [ECF #48], in another habeas action pending in District Court (*Darryl Frierson*, #336466 vs. *Charles Williams*, C/A No. 8:18-2111-BBH — *June 18, 2019*);
5. Completed and submitted Orders of Dismissal in two non-capital post-conviction matters in the Eleventh Judicial Circuit (*Curtis Johnson v. State* — *June 3, 2019*; and *Kerwin Parker v. State* — *June 10, 2019*); and
6. Undersigned counsel has been working to complete substantial post-hearing briefing in a capital-post-conviction relief action in order to meet her deadline of July 3, 2019 (*Stanko v. State* — *Georgetown County capital post-conviction relief matter*).

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. Undersigned counsel has consulted with opposing counsel who consents to this request.

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.

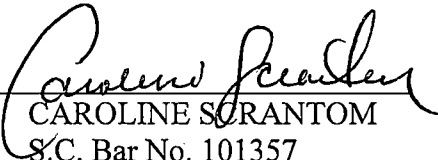
Respectfully submitted,

ALAN WILSON
Attorney General

DONALD J. ZELENKA
Deputy Attorney General

MELODY J. BROWN
Senior Assistant Deputy Attorney General

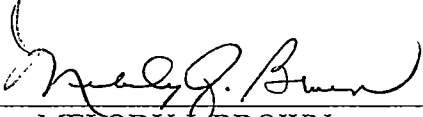
CAROLINE SCRANTOM
Assistant Attorney General

BY: 
CAROLINE SCRANTOM
S.C. Bar No. 101357
Office of the Attorney General
Post Office Box 11549
Columbia, South Carolina 29211
(803) 734-6305

ATTORNEY FOR RESPONDENT

July 3, 2019
Columbia, South Carolina

I support the finding of good cause.

By: 
MELODY J. BROWN
Senior Assistant Deputy Attorney General

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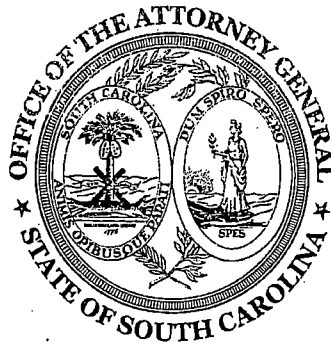
I, **Caroline Scrantom**, certify that I have served Respondent's Motion for a Third Extension of Time to file Initial Brief of Respondent and Designation of Matter by depositing two (2) copies of the same in the United States mail, postage prepaid, to counsel for Appellant, addressed as follows:

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

This 3rd day of July, 2019.


CAROLINE SCRANTOM
S.C. Bar No. 101357
Post Office Box 11549
Columbia, South Carolina 29211
(803) 734-6305

ATTORNEY FOR RESPONDENT



ALAN WILSON
ATTORNEY GENERAL

July 3, 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 Third Motion for Extension of Time to File Initial Brief of Respondent, together with Proof of Service, in the above-referenced matter. Opposing counsel has graciously consented to this extension request.

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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