

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED
JUL 80 2019
SC Court of Appeals

Appeal From Aiken County
The Honorable William P. Keesley Circuit Court Judge
Appellate Case No. 2018-000455

THE STATE,

RESPONDENT,

VS.

WILLIAM TIAY CHANDLER,

APPELLANT.

**MOTION FOR AN EXTENSION TO FILE INITIAL BRIEF OF RESPONDENT
AND DESIGNATION OF MATTER OUT OF TIME AND FOR AN ADDITIONAL
THIRTY DAYS**

Respondent, through its undersigned attorney, would respectfully show as follows:

1. The Initial Brief of Respondent and Designation of Matter was due to be served and filed July 29, 2019.
2. The undersigned requests a fifth and final thirty-day extension in which to serve and file these documents, which is not made for the purpose of delay, but due to a heavy workload and the limited number of hours she is allowed to work each day due to a work-related injury. The undersigned has worked to finalize the brief within the 10 days extension granted by the Court, but has been unable to complete the brief.
3. The undersigned is also the supervisor for the SVP Unit at the Attorney General's office. The SVP unit is staffed by two full-time attorneys. However, since December 2018, the Unit has been operating with only one full-time attorney. Due to this shortage, the undersigned

has been required to represent the SVP unit on matters in Circuit Court. She was unexpectedly required to appear in Circuit Court on July 29, 2019, in Aiken County and overlooked the due date to file the Initial Brief of Respondent and Designation of Matter. The undersigned assures the Court the brief is a high priority, and she will work diligently to complete it.

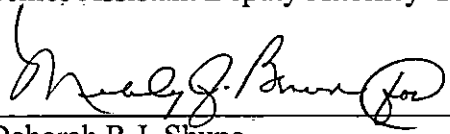
4. On June 10, 2019, the undersigned filed the Respondent's Return to Petition for Writ of Certiorari with the Supreme Court in The State v. Michael Mealor. On July 12, 2019, the undersigned filed the Final Brief of Respondent in the Court of Appeals in The State v. Sidney St. Clair Moorner. On July 26, 2019, the undersigned filed the Initial Brief of Respondent and Designation of Matter with the Court of Appeals in The State v. John Arthur James.

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

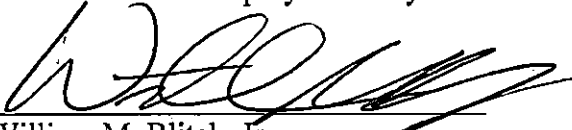
Based on the foregoing, Respondent respectfully requests this Court hold this matter in abeyance pending a resolution of this motion, and grant the Respondent the requested relief.

ALAN WILSON
Attorney General

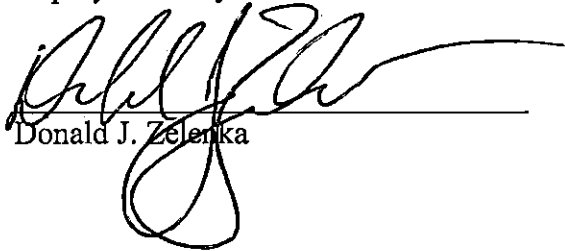
DEBORAH R.J. SHUPE
Senior Assistant Deputy Attorney General


Deborah R.J. Shupe

WILLIAM M. BLITCH, JR.
Senior Assistant Deputy Attorney General

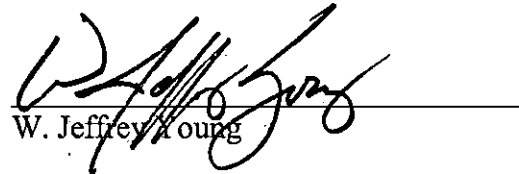

William M. Blitch, Jr.

DONALD J. ZELENKA
Deputy Attorney General



Donald J. Zelenka

W. JEFFREY YOUNG
Chief Deputy Attorney General



W. Jeffrey Young

ATTORNEYS FOR RESPONDENT
Office of the Attorney General
Post Office Box 11549
Columbia, SC 29211
(803) 734-3970

July 30, 2019

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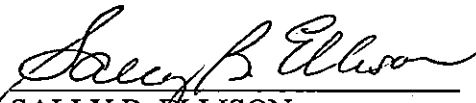
PROOF OF SERVICE

I, Sally Ellison, certify I served and filed the Motion for a Fifth Extension to File Initial Brief of Respondent and Designation of Matter Out of Time and For an Additional 30 Days, by depositing a copy in the United States mail, postage prepaid, addressed to:

Kathrine H. Hudgins
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 30th day of July, 2019.


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



ALAN WILSON
ATTORNEY GENERAL

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SC Court of Appeals

July 30, 2019

HAND-DELIVERY

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

Re: The State v. William Tiay Chandler
Appellate Case No. 2018-000455

Dear Ms. Kitchings:

Enclosed for filing are an original and seven (7) copies of a Motion for a Fifth and Final Extension to File Initial Brief of Respondent and Designation of Matter, with Proof of Service.

Sincerely yours,

Deborah R.J. Shupe
Senior Assistant Deputy Attorney General

DRJS/se
Enclosures

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