

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

---

Appeal from Georgetown County  
Larry B. Hyman, Circuit Court Judge

---

THE STATE,

Respondent,

v.

JODY L. WARD,

**RECEIVED**

AUG 07 2019

Appellant **SC Court of Appeals**

Appellate Case No. 2018-000402.

---

**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 this Court:

1. The transcript of record from a December 10, 2015 proceeding in this matter remains outstanding and was ordered by Respondent on June 24, 2019. Appellant has designated this transcript of record as part of the record on appeal and is required for review prior to completion of Respondent's initial brief.
2. Undersigned counsel for Respondent has also been scheduled to complete a number of state and federal matters in the last thirty (30) days to include the following:
  - a. Drafted and filed another Initial Brief of Respondent in a non-capital murder

appeal in this Court (*Jane Hughes v. State—August 2, 2019*);

b. Drafted and filed a Return and Memorandum in Support of Summary Judgment in a capital Federal Habeas Corpus action in the Federal District Court for the District of South Carolina (*Quincy Allen v. Warden—July 15, 2019*);

c. Drafted and filed another Return and Memorandum in Support of Summary Judgment in a non-capital Federal Habeas Corpus action in the Federal District Court for the District of South Carolina (*Ralph Hayes v. Warden—July 18, 2019*).

For the foregoing reasons, 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 counsel for Appellant who has consented 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

  
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

August 7, 2019  
Columbia, South Carolina

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

Appeal from Georgetown County  
Larry B. Hyman, Circuit Court Judge

RECEIVED  
AUG 07 2019  
SC Court of Appeals

THE STATE,

Respondent,

v.

JODY L. WARD,

Appellant

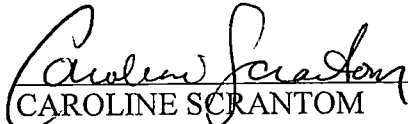
Appellate Case No. 2018-000402.

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:

Tristan M. Shaffer  
Tristan M. Shaffer, Attorney at Law  
P.O. Box 1027  
Chapin, SC 29036

This 7<sup>th</sup> day of August, 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

August 7, 2019

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


Re: *The State v. Jody Lynn Ward*  
Appeal from Georgetown County  
Appellate Case No. 2018-000402

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. Counsel for Appellant has consented to this extension request.

Thank you for your assistance in this matter.

Sincerely,

  
Caroline Scrantom  
Assistant Attorney General

CS:dmd  
Enclosures  
cc: Tristan M. Shaffer, Esq. (w/two copies of encls.)

**RECEIVED**

AUG 07 2019

SC Court of Appeals