

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM THE STATE GRAND JURY  
Richland County  
Court of General Sessions

Carmen T. Mullen, Circuit Court Judge

Lower Court Case No. 2017-GS-47-35, -36, -37;  
2018-GS-47-49

RECEIVED

SEP 23 2019

SC Court of Appeals

The State.....Respondent,

v.

James H. Harrison.....Appellant.

Appellate Case No. 2018-002128

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


Respondent respectfully requests an additional 30 (thirty) day extension of time to file Respondent's initial brief and designation of matter. The Initial Brief of Respondent and Designation of Matter are due to be filed September 20, 2019. Pursuant to RE: Extension Requests in Criminal Direct Appeals and Post-Conviction Relief Certiorari Proceedings, S.C.Sup.Ct. Order dated March 18, 2009 (Davis Adv.Sh. No. 13), Respondent moves for a second extension in the above captioned appeal. Good cause exists to grant this extension because this matter presents complex issues and the undersigned has been required to attend to numerous other time sensitive responsibilities for the First Judicial Circuit. As a result, Counsel for the State requires additional

time to complete the brief. The undersigned has consulted with opposing counsel regarding this request and they have no objection.

This extension request is not intended for purposes of delay, but rather to ensure the brief is properly researched and prepared. The brief is substantially complete, and Counsel for the State does not anticipate any further extensions. I would therefore request a second extension of time to file the Initial Brief of Respondent and Designation of Matter.

WHEREFORE, Respondent prays that the Court hold this matter in abeyance until ruling on this motion and extend the deadline for service and filing of the Initial Brief of Respondent and Designation of Matter in this case for thirty (30) days from the date such relief is granted; and for such other and further relief as the Court may deem just and proper.

Respectfully submitted by,

  
W. Baker Allen  
SC Bar No.: 80237  
Assistant Solicitor  
First Judicial Circuit

David M. Pascoe  
SC Bar No.: 66523  
First Circuit Solicitor  
P.O. Box 1525  
Orangeburg, SC 29116  
(803) 533-6252  
Attorneys for Respondent

September 20, 2019  
Summerville, South Carolina

In the Court of Appeals

APPEAL FROM THE STATE GRAND JURY  
Richland County  
Court of General Sessions

Carmen T. Mullen, Circuit Court Judge

RECEIVED

SEP 23 2019

SC Court of Appeals

Lower Court Case No. 2017-GS-47-35, -36, -37;  
2018-GS-47-49

The State,.....Respondent;

v.


James H. Harrison.....Appellant.

Appellate Case No. 2018-002128

**PROOF OF SERVICE**

I, W. Baker Allen, certify that I have served the Motion for Extension of Time to File Initial Brief and Designation of Matter – Second on Appellant by depositing a copy of the same in the United States mail, postage prepaid, this 20th day of September, 2019, addressed to:

Elizabeth Van Doren Gray  
Robert E. Stepp  
Vordman Carlisle Traywick, III  
Post Office Box 11449  
Columbia, South Carolina 29211

  
W. Baker Allen  
Assistant Solicitor  
First Judicial Circuit  
P.O. Box 1525  
Orangeburg, SC 29116

# The State of South Carolina

OFFICE OF SOLICITOR  
First Judicial Circuit

140 North Main Street  
Suite 102  
Summerville, SC 29483  
(843) 871-2640  
FAX (843) 871-2643  
PTI (843) 873-7842

5200 East Jim Bilton Boulevard  
Dorchester County Courthouse  
St. George, SC 29477  
(843) 832-0150  
FAX (843) 832-0155



**DAVID M. PASCOE**  
Solicitor

Courthouse, Amelia Street  
Post Office Box 1525  
Orangeburg, SC 29116  
(803) 533-6252  
FAX (803) 533-6004  
PTI (803) 533-6137

102 Courthouse Drive  
Suite 111  
St. Matthews, SC 29135  
(803) 874-1978  
FAX (803) 874-1242

September 20, 2019


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

RE: The State v. James H. Harrison  
Appellate Case No. 2018-002128

Dear Ms. Kitchings:

Enclosed please find the original and six (6) copies of a Motion for Extension of Time to File Initial Brief and Designation of Matter – Second along with proof of service for filing in the above referenced appeal.

Sincerely,

  
W. Baker Allen  
Assistant Solicitor  
First Judicial Circuit

Enclosures

cc: Elizabeth Van Doren Gray  
Robert E. Stepp,  
Vordman Carlisle Traywick, III

**RECEIVED**

SEP 23 2019

SC Court of Appeals



1000



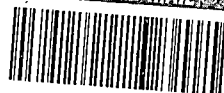
22211

U.S. POSTAGE PAID  
SC 112 ENVY  
SUMMERVILLE, SC  
29523  
SEP 23 19  
RECEIVED  
\$4.95  
R23035100997-08

The State of South Carolina  
OFFICE OF SOLICITOR  
FIRST JUDICIAL CIRCUIT  
140 NORTH MAIN STREET • SUITE 102  
SUMMERVILLE, S.C. 29483

RECEIVED  
SEP 23 2019  
SC Court of Appeals

7019 0140 0000 0291 6143



7019 0140 0000 0291 6143

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

9/21