

STATE OF SOUTH CAROLINA  
In the Court of Appeals

Appeal From Laurens County  
Frank R. Addy, Jr., Circuit Court Judge  
Appellate Case No: 2018-001684

**RECEIVED**  
OCT 04 2019  
SC Court of Appeals

THE STATE,

Respondent,

vs.

MICHAEL CLIFF EUBANKS,

Appellant.

**MOTION FOR THIRD EXTENSION  
TO SERVE AND FILE INITIAL BRIEF OF RESPONDENT  
AND DESIGNATION OF MATTER**

Respondent, through its undersigned counsel, would respectfully show unto this Court as follows:

I.

The Initial Brief of Respondent and Designation of Matter are due today.

II.

Due to work required in other direct appeals pending before this Court and the South Carolina Supreme Court, I am unable to complete the Brief on time. The undersigned has completed several briefs to the South Carolina Supreme Court, returns to petitions for writ of certiorari to the Supreme Court, and petitions for rehearing to both appellate courts. I would therefore request a third extension of time within which to serve and file the Initial Brief of Respondent and Designation of Matter.

III.

This extension request is not intended for purposes of delay, but rather to ensure that the Brief is properly researched and prepared.

WHEREFORE, Respondent prays that the Court extend the deadline for the service and filing of the Initial Brief of Respondent and Designation of Matter in this case for thirty (30) days; and for such other and further relief as the Court may deem just and proper.

Respectfully submitted,

ALAN WILSON  
Attorney General

DONALD J. ZELENKA  
Deputy Attorney General

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

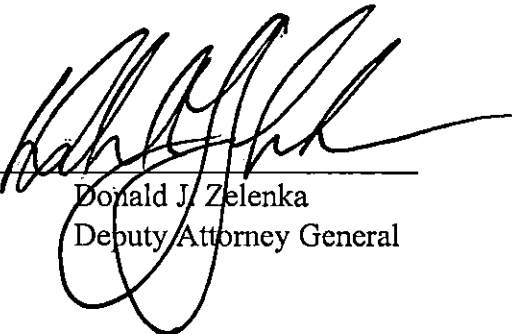
By:



William M. Blitch, Jr.  
S.C. Bar No: 15608  
Office of the Attorney General  
Post Office Box 11549  
Columbia, SC 29211  
(803) 734-3727

I have reviewed and approved this extension request:

By:



Donald J. Zelenka  
Deputy Attorney General

October 4, 2019

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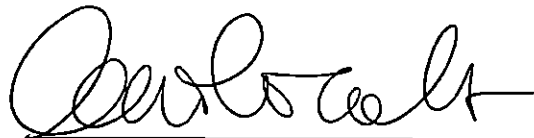
**PROOF OF SERVICE**

I, Caroline Collins, certify that I have served the Motion Out of Time for Third Extension to Serve and File Initial Brief of Respondent and Designation of Matter on Appellant by having copies delivered to his attorney of record below:

E. Charles Grose, Jr.  
The Grose Law Firm, LLC  
404 Main Street  
Greenwood, South Carolina 29646

I further certify that all parties required by Rule to be served have been served.

This 4<sup>th</sup> day of October, 2019.



CAROLINE COLLINS  
Administrative Coordinator  
Office of Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29211  
(803) 734-3727



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OCT 04 2019

SC Court of Appeals

ALAN WILSON  
ATTORNEY GENERAL

October 4, 2019

**VIA HAND DELIVERY**

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

RE: State v. Michael Cliff Eubanks  
Appellate Case No. 2018-00001684

Dear Ms. Kitchings:

Enclosed please find the original and six copies of the Motion for Third Extension of Time, along with proof of service, for filing in the above-referenced appeal.

Sincerely,

William M. Blich, Jr.  
Senior Assistant Deputy Attorney General  
S.C. Bar Number 15608

Enclosures

cc: E. Charles Grose, Jr., Esq.  
Victim Advocacy Division