

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Spartanburg County
Honorable J. Derham Cole, Circuit Court Judge
Appellate Case No. 2018-001891

RECEIVED
OCT 24 2019
SC Court of Appeals

THE STATE,

RESPONDENT,

V.

JYQUEZ JULIUS FREEMAN,

APPELLANT.

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

Respondent, State of South Carolina, hereby moves for a second extension of time to file the Initial Brief of Respondent and Designation of Matter to be included in the Record on Appeal.

In support of this motion, Respondent submits the following:

1. The Initial Brief of Respondent and Designation of Matter are due to be filed and served October 24, 2019, pursuant to a first extension. Respondent requests a second extension to serve and file these documents, which is not made for the purpose of delay, but due to a heavy workload.

2. Counsel has worked on the Initial Brief and Designation of Matter, but has been unable to complete the Brief prior to the due date. Counsel assures the Court completion of the Brief is a high priority, and he will work diligently to complete it.

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

Based on the foregoing, counsel for the Respondent respectfully requests that this Court grant a second 30-day extension in which to file and serve the Initial Brief of Respondent and Designation of Matter, and that all deadlines be held in abeyance pending resolution of this motion.

Respectfully submitted,


ALAN WILSON
Attorney General

DONALD J. ZELENKA
Deputy Attorney General

MELODY J. BROWN
Senior Assistant Deputy Attorney General

SCOTT MATTHEWS
Assistant Attorney General

Post Office Box 11549
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(803) 734-6305

By: 
SCOTT MATTHEWS
Attorney for Respondent

October 24, 2019

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PROOF OF SERVICE

I, Sally Ellison, certify that I have served two (2) copies of the Motion for Second Extension to file Initial Brief of Respondent and Designation of Matter via U.S. Mail, to Appellant's counsel of record, Kathrine H. Hudgins, Esquire, SCCID/Division of Appellate Defense, 1330 Lady Street, Suite 401, Columbia, SC, 29201. I further certify all parties required by Rule to be served have been served.

This 24th day of October, 2019.


Sally Ellison
Legal Assistant
Office of the Attorney General
PO Box 11549
Columbia, South Carolina 29211
803-734-4156



ALAN WILSON
ATTORNEY GENERAL

October 24, 2019

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

Re: The State v. Jyquez Julius Freeman
Appellate Case No. 2018- 001891

Dear Ms. Kitchings:

Enclosed are an original and seven (7) copies of a Motion for Second Extension to file Initial Brief of Respondent and Designation of Matter in the above appeal, with Proof of Service.

Sincerely,

Scott Matthews
Assistant Attorney General
Bar #: 101464

JSM/te
Enclosures

cc: Kathrine H. Hudgins, Esquire
Victim Advocacy Division

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