

STATE OF SOUTH CAROLINA  
In the Court of Appeals

Appeal From Greenville County  
Letitia H. Verdin, Circuit Court Judge  
Appellate Case No: 2018-001754

**RECEIVED**  
OCT 25 2019  
SC Court of Appeals

THE STATE,

Respondent,

vs.

WILLIAM LEE CARPENTER,

Appellant.

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

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

I.

The State's Initial Brief and Designation of Matter are due to be served and filed 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 a Brief of Respondent in State v. Michael Juan Smith to the South Carolina Supreme Court, returns to petitions for writ of certiorari in State v. Jermaine Hodge, State v. Terrance Stewart, and State v. Tony Kinard to the Supreme Court, petitions for writ of certiorari to the South Carolina Supreme Court in State v. Tony Kinard, and petitions for rehearing to both appellate courts. The undersigned also spoke at several trainings including the Solicitor's Conference and an annual Summary Court training. Additionally, I just received a copy of the transcript in this case which was inadvertently not previously ordered. The undersigned is currently working on this

brief and believes he will have it completed without need for further extensions. I would therefore request a fourth 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. Blich, 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 23, 2019

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vs.

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Appellant.

**PROOF OF SERVICE**

I, Caroline Collins, certify that I have served the Motion for Fourth Extension to Serve and File Initial Brief of Respondent and Designation of Matter on Appellant by depositing a copy of the same in the United States mail, postage prepaid, addressed to each of his attorneys of record below:

Elizabeth Anne Franklin-Best, Esquire  
Blume Norris & Franklin-Best LLC  
900 Elmwood Avenue, Suite 200  
Columbia, South Carolina 29201

Fletcher N. Smith, Jr., Esquire  
Law Firm of Fletcher N. Smith, Jr., LLC  
112 Wakefield Street  
Greenville, South Carolina 29601

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

This 25<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



ALAN WILSON  
ATTORNEY GENERAL

October 25, 2019

**VIA HAND DELIVERY**

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

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SC Court of Appeals

RE: State v. William Lee Carpenter  
Appellate Case No. 2018-001754

Dear Ms. Kitchings:

Enclosed please find the original and six copies of the Motion for Fourth 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: Elizabeth A. Franklin-Best, Esq.  
Fletcher N. Smith, Jr., Esq.  
Victim Advocacy Division