

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Colleton County  
Honorable Perry M. Buckner, Circuit Court Judge

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THE STATE,

RESPONDENT,

v.

ANDRE NICHOLAS CRAWFORD,

APPELLANT.

APPELLATE CASE NO. 2018-001216

RECEIVED  
JAN 02 2020  
SC Court of Appeals

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

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The above-named Respondent, by and through the undersigned attorneys, would respectfully move this Court for a fourteen (14) day extension of time within which to file the Initial Brief of Respondent and Designation of Matter. The Brief in the above action is due to be served and filed today, January 2, 2020. The undersigned counsel for the Respondent will not be able to respond within the allotted time for the following reasons:

1. Counsel has been reviewing matters due to his involvement as Chairman on the Office of the Attorney General's Appellate Decision Review Committee. The Committee was formed to review all adverse decisions in Capital, Federal Habeas, Direct Appeals, and Post-Conviction Relief matters, and to determine whether the State will appeal these rulings. In the last thirty days, counsel has reviewed the following matters: On November 29, 2019 *State vs. Terrance O. Frazier*, Appellate Case No.2015-002464, Remanded Unpublished Opinion 2019-UP-371 filed on November 27, 2019, an adverse ruling by the South Carolina Court of Appeals;

On December 6, 2019 *Miguel Alejandro Urena vs. State of South Carolina*, 2015-CP-18-994, a Dorchester County Post-Conviction Relief matter; also on December 6, 2019 *Oscar Fortune v. State of South Carolina*, Appellate Case No. 2016-002231, a Chesterfield County Post-Conviction Relief Appeal matter [South Carolina Supreme Court Reversed Opinion No. 27932 filed December 4, 2019], On December 13, 2019, *Justin Jamal Lewis v. State*, 2019-CP-21-580, a Florence County Post-Conviction Relief Matter, On December 20, 2019, *Farid Ahmad Mangal, a/k/a Farid Ahmad Maugal vs. Warden, Perry Correctional Institution*, Case No: 6:18-00106-RBH, a Spartanburg County Federal Habeas Matter; *The State v. Marquez Devon Glenn*, Appellate Case No: 2018-001478, a Greenville County appeal matter now pending in the South Carolina Supreme Court; and *Anthony Woods vs. State*, Appellate Case No. 2019-001713, a Clarendon County capital matter now pending in the South Carolina Supreme Court;

2. Counsel filed the Status Report in the matter of James D. Robertson v. Jon Ozmint, C/A No. 2:11-63-TMC-MGB on December 2, 2019;

3. Due to the Opinion issued by the South Carolina Supreme Court on December 18, 2019 prior to the filing of Respondent's Return to Petition for Writ of Certiorari, undersigned counsel had to prepare an expedited Petition for Rehearing. Undersigned counsel filed the Petition for Rehearing in the matter of Anthony Woods vs. State of South Carolina, Appellate Case No. 2019-001713, a Clarendon County capital matter now pending before the South Carolina Supreme Court on December 27, 2019; and

4. Counsel is currently researching and preparing the Initial Brief of Respondent in the above matter.

Due to counsel's involvement in these and other matters pending in state and federal court, counsel for Respondent moves this Court to enlarge the time for filing the Initial Brief of

Respondent and Designation of Matter by fourteen (14) days up to and including January 16, 2020. This request is made in good faith, and not for the purpose of delay.

Respectfully Submitted,

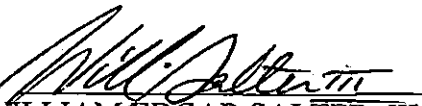
ALAN WILSON  
Attorney General

DONALD J. ZELENKA  
Deputy Attorney General

MELODY J. BROWN  
Senior Assistant Deputy Attorney General  
No. 07979

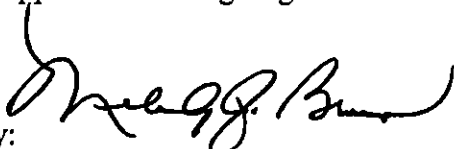
WILLIAM EDGAR SALTER, III  
Senior Assistant Attorney General  
No. 3710

Post Office Box 11549  
Columbia, South Carolina 29211  
(803) 734-6305

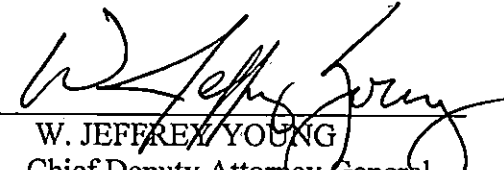
By:   
WILLIAM EDGAR SALTER, III  
ATTORNEYS FOR RESPONDENT

January 2, 2020.

I support the finding of good cause.

By:   
MELODY J. BROWN,  
Senior Assistant Deputy Attorney General

I also support the finding of good cause.

By:   
W. JEFFREY YOUNG  
Chief Deputy Attorney General

**STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

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Appeal from Colleton County  
Honorable Perry M. Buckner, Circuit Court Judge

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**THE STATE,**

**RESPONDENT,**

**V.**

**ANDRE NICHOLAS CRAWFORD,**

**APPELLANT.**

**APPELLATE CASE NO. 2018-001216**

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**PROOF OF SERVICE**

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I, Angela B. Brown, certify that I have served the Motion for Extension of Time to File Initial Brief of Respondent and Designation of Matter on Appellant by depositing two copies of the same in the United States mail, postage prepaid, addressed to: Robert M. Dudek, Esquire, Office of Appellate Defense, P.O. Box 11589, Columbia, South Carolina 29211.

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

This 2<sup>nd</sup> day of January, 2020.

  
\_\_\_\_\_  
ANGELA B. BROWN  
Administrative Coordinator

Office of Attorney General  
Post Office Box 11549  
Columbia, SC 29211  
(803) 734-3727

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JAN 02 2020  
SC Court of Appeals



ALAN WILSON  
ATTORNEY GENERAL

January 2, 2020

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

RECEIVED  
JAN 02 2020  
SC Court of Appeals

Re: The State vs. Andre Nicholas Crawford  
Appeal from Colleton County  
Appellate Case No. 2018-001216

Dear Ms. Kitchings:

Enclosed for filing are the original and six (6) copies of the Respondent's Fifth Motion for Extension of Time to File Initial Brief of Respondent and Designation of Matter, together with Proof of Service, in the above-referenced matter.

Sincerely,

Angela B. Brown  
Legal Assistant to William Edgar Salter, III  
Senior Assistant Attorney General

WES/ab  
Enclosures

cc: Robert M. Dudek, Esquire (w/two copies of encls.)  
Victim Advocacy Division (w/copy of encl.)