

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Edgefield County  
Honorable Eugene C. Griffith, Jr., Circuit Court Judge

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THE STATE,

v.

WILLIAM C. (Billy) SELLERS,

**RECEIVED**  
DEC 18 2019  
Respondent,  
SC Court of Appeals

Appellant

Appellate Case No. 2018-001667

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

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Respondent, the State, moves this Court for an additional thirty (30) day extension of time in which to file the Initial Brief of Respondent and Designation of Matter. This is Respondent's second request for an extension of time in which to file the brief. In support of the request, undersigned counsel for Respondent would respectfully show unto the Court that she has been scheduled to complete a number of state and federal matters in the last thirty (30) days to include the following:

1. Counsel filed the Final Brief of Respondent in the matter of The State vs. Jody L. Ward, a Georgetown County non-capital murder appeal matter now pending in the South Carolina Court of Appeals (November 19, 2019);
2. Counsel drafted and filed the Return to the Third Amended Post-Conviction Relief Application in the Lexington County capital post-conviction relief matter of Norman

Starnes vs. The State, C/A No. 2011-CP-32-830 (November 22, 2019);

3. Counsel drafted and filed the Return to Petition for Writ of Certiorari in the matter of The State vs. John Marion Ghent, Jr., a non-capital murder appeal now pending in the South Carolina Supreme Court (December 9, 2019);

4. Counsel drafted and filed the Return and Memorandum of Law in Support of Motion for Summary Judgment in the matter of Rashawn S. Murphy, #323547 vs. Kenneth Nelson, Warden, C/A No. 4:19-2803-DCC-TER, a matter pending in the United States District Court for the District of South Carolina (December 10, 2019);

5. Counsel prepared for and attended a hearing in Anderson County on the State's Motion to Set Aside Default in the non-capital post-conviction relief matter of Anthony Clark Odom vs. State of South Carolina, 2019-CP-37-0376 (December 11, 2019);

6. Counsel prepared for and attended oral argument in this Court in the non-capital direct appeal The State vs. John Christopher Hart (December 12, 2019);

7. Counsel traveled to Washington, D.C. for the purpose of being sworn in as a member of the United States Supreme Court bar on December 16, 2019;

8. Counsel is also currently working to comply with a United States District Court deadline for filing the complete state court record in the capital federal habeas corpus matter of Stephen Stanko vs. Stirling, et al., C/A No. 1:19-03257-RMG-SVH, which is currently due to be filed tomorrow, December 19, 2019.

Due to counsel's involvement in these and other matters in state and federal court, counsel has not been able to complete the Initial Brief of Respondent in this action. This request is made in good faith, and not for the purposes of delay. Thus, counsel respectfully requests a thirty (30) day extension of time to allow counsel to complete the Initial Brief of Respondent. This is counsel's second request for additional time to do so.

WHEREFORE, undersigned counsel for Respondent respectfully requests an additional extension of thirty (30) days to complete the Initial Brief of Respondent and Designation of Matter.

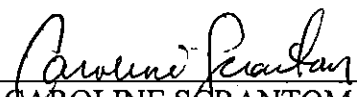
Respectfully submitted,

ALAN WILSON  
Attorney General

DONALD J. ZELENKA  
Deputy Attorney General

MELODY J. BROWN  
Senior Assistant Deputy Attorney General

CAROLINE SCRANTOM  
Assistant Attorney General

By:   
CAROLINE SCRANTOM  
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Columbia, South Carolina 29211  
(803) 734-6305  
ATTORNEY FOR RESPONDENT

December 18, 2019  
Columbia, South Carolina

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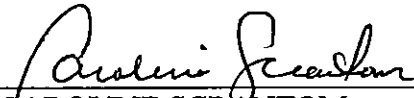
PROOF OF SERVICE

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I, Caroline Scrantom, certify that I have served Respondent's Motion for a Second Extension of Time to file Initial Brief of Respondent and Designation of Matter by depositing two (2) copies of the same in the United States mail, postage prepaid, to counsel for Appellant, addressed as follows:

Robert M. Dudek, Esq.  
SCCID/Division of Appellate Defense  
1330 Lady Street, Suite #401  
Columbia, South Carolina 29201

This 18<sup>th</sup> day of December, 2019.



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CAROLINE SCRANTOM  
S.C. Bar No. 101357  
Post Office Box 11549  
Columbia, South Carolina 29211  
(803) 734-6305

ATTORNEY FOR RESPONDENT



ALAN WILSON  
ATTORNEY GENERAL

December 18, 2019

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

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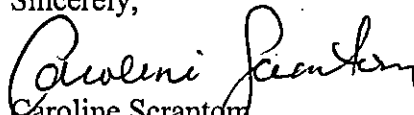
Re: *The State v. William C. (Billy) Sellers*  
Appeal from Edgefield County  
Appellate Case No. 2018-001667

Dear Ms. Kitchings:

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

Thank you for your assistance in this matter.

Sincerely,

  
Caroline Scrantom  
Assistant Attorney General

CS:dmd

Enclosures

cc: Robert M. Dudek, Esq. (w/two copies of encls.)