

RECEIVED

May 26 2020

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Berkeley, Charleston, and Dorchester Counties
Honorable R. Markley Dennis, Jr., Circuit Court Judge
Appellate Case No. 2019-000957

THE STATE,

Respondent,

vs.

LOUIS NEAL REVILLE,

Appellant.

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

Respondent (“the State”), through its undersigned counsel, would respectfully show unto the Court as follows:

I.

The Initial Brief of Respondent and Designation of Matter are due to be served and filed on May 26, 2020.

II.

Pursuant to RE: Extension Requests in Criminal Direct Appeals and Post-Conviction Relief Certiorari Proceedings: Order of the South Carolina Supreme Court dated March 18, 2009, the State moves for a **third** extension in the above-referenced criminal appeal and asks for an additional thirty days to complete the brief in this case. In the past few weeks, the undersigned counsel has participated in oral argument at the Supreme Court in State v. John

Kenneth Massey, Jr.; has participated in oral argument at the Court of Appeals in State v. Ontavious Derenta Plumer, State v. Justin Adams, State v. Howard James Woods, and State v. Steven Louis Barnes; has submitted an Initial Brief of Respondent to the Court of Appeals in State v. Keunte D. Cobbs, State v. Victoria Lorraine Sanchez, State v. Gregg Pickrell, State v. Carl Ray Fraley, Jr., and State v. Sherwin A. Green; has submitted a Petition for Writ of Certiorari to the Supreme Court in State v. Kenneth Strothers Collins; and has submitted a Petition for Rehearing and Suggestion for Rehearing En Banc to the Court of Appeals in State v. Kenneth Strothers Collins.

III.

The undersigned counsel submits this extension request is supported by good cause and is not intended for purposes of delay. To date, the undersigned counsel has been unable to complete the Brief in this case due to work required in other cases. Beyond that, the Brief in the above-referenced case has required significant research because the case involves important sentencing issue in a case involving numerous convictions for sexual offenses committed against many juvenile victims. The undersigned counsel is currently working on the Brief in this case and intends to have it finished in a timely manner. However, the undersigned counsel has not yet been able to finish the Brief. Accordingly, in order to ensure the Brief is properly researched and prepared, I would therefore request an additional extension of time within which to serve and file the Brief.

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 days from the date such relief is granted; hold the matter in abeyance pending a ruling on

Respondent's motion; and grant such other and further relief as the Court may deem just and proper.

Respectfully submitted,

ALAN WILSON
Attorney General

MARK R. FARTHING
Senior Assistant Attorney General



By: _____
Mark R. Farthing

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

I have reviewed and approved this extension request.

By: 
William M. Blich, Jr.
Senior Assistant Deputy Attorney General

May 26, 2020

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

May 26 2020

SC Court of Appeals

Appeal from Berkeley, Charleston, and Dorchester Counties
Honorable R. Markley Dennis, Jr., Circuit Court Judge
Appellate Case No. 2019-000957

THE STATE,

Respondent,

vs.

LOUIS NEAL REVILLE,

Appellant.

PROOF OF SERVICE

I, Anne Mueller, certify I have served the within Motion for Third Extension of Time Within Which to Serve and File Initial Brief of Respondent and Designation of Matter on Appellant by sending an electronic copy via email to the address listed in AIS for the following individual and by mailing copies to:

Tommy A. Thomas, Esq.
Post Office Box 88
Irmo, SC 29063

I further certify all parties required by Rule to be served have been served.
This 26th day of May, 2020.


ANNE MUELLER
Legal Assistant
Office of the Attorney General
Post Office Box 11549
Columbia, SC 29211
(803) 734-3727

From: Anne Mueller
To: ["thomaslaw@me.com"](mailto:thomaslaw@me.com)
Cc: [Mark Farthing \(mfarthing@scag.gov\)](mailto:Mark.Farthing@scag.gov); [William Blicht \(wblicht@scag.gov\)](mailto:William.Blicht@scag.gov); [Victim Services](#); [Shana Montgomery](#); [Anne Mueller \(amueller@scag.gov\)](mailto:Anne.Mueller@scag.gov)
Subject: State v. Louis Neal Reville, Appellate Case No. 2019-000957
Date: Tuesday, May 26, 2020 9:53:00 AM
Attachments: [Reville Louis - Motion for Third Extension \(State's IBOR\) \(02285374xD2C78\).pdf](#)
[Reville Louis - Cover letter for State's Motion for Third Extension \(02285377xD2C78\).pdf](#)

Dear Mr. Thomas,

Attached is the State's Motion for Third Extension in the above-referenced matter. This motion will be filed with the Court today through AIS One Drive.

Sincerely,

Anne Mueller

Legal Assistant



Anne A. Mueller

*Legal Assistant
Criminal Appeals Division
Office of the Attorney General
(803) 734-3922*

RECEIVED

May 26 2020

SC Court of Appeals