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May 27 2020

SC Court of Appeals

STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Greenville County
The Honorable Alexander S. Macaulay, Circuit Court Judge

THE STATE,

Respondent,

v.

BRADFORD HESTER WILLIAMS,

Appellant.

Appellate Case No. 2017-001753

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

The undersigned counsel would respectfully request a thirty (30) day extension in which to file the Initial Brief of Respondent in the above-referenced case. Opposing counsel, Kathrine H. Hudgins, Esq., Appellate Defender has consented to extension requests through June 30, 2020. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

Respondent's Initial Brief is due today, Wednesday, May 27, 2020. The undersigned attorney has had a number of state and federal matters to attend since April 27, 2020. Specifically,

1. Counsel filed the Respondent's *Brief Reply to Various Responses in Opposition and Supplements* [ECF #47, #48, #50, & #51] in the matter of George A. Cousins vs. Warden Kendall, C/A No. 8:19-03021-TMC-JDA on May 8, 2020;

2. Counsel filed the Respondent's Response in Opposition to Motion to Expand the Record [ECF #49], in the matter of George A. Cousins vs. Warden Kendall, C/A No. 8:19-03021-TMC-JDA also on May 8, 2020;

3. Counsel filed the Respondent's Response to Motion to Amend the Petition [ECF #20] in the matter of Ryan P. Deleston v. Warden Nelsen, C/A No. 0:20-717-TMC-PJG on May 12, 2020;

4. Counsel filed Respondent's Response in Opposition to Motion to Alter or Amend Judgment [ECF #64], in the matter of John Wayne Brannon, #209650 vs. Warden Williams, C/A No. 4:18-3321-SAL on May 18, 2020;

5. Counsel filed the Return and Memorandum of Law in Support of Motion for Summary Judgment in the matter of Eric Vancleave, #354843 vs. Bryan Stirling and Michael Stephen, C/A No. 0:20-99-RMG-PJG on May 26, 2020; and

6. Counsel is currently reviewing the Transcript of Record for preparation of the Initial Brief of Respondent in this matter. Counsel is also diligently trying to obtain a copy of State's Exhibit #53 – CD – Audio Interview of Mitchell Sloan.

7. Counsel has been out of the office due to family medical leave.

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 response by granting a thirty (30) day extension up to and including June 26, 2020. This request is made in good faith, and not for the purpose of delay.

WHEREFORE, for good cause shown, counsel respectfully requests a thirty (30) day extension of time to serve and file the Initial Brief of Respondent and Designation of Matter. This request is made in good faith, and not for the purposes of delay.

Respectfully submitted,

ALAN WILSON
Attorney General

DONALD J. ZELENKA
Deputy Attorney General

MELODY J. BROWN
Senior Assistant Deputy Attorney General
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May 27, 2020.

By: W. Joseph Maye
ATTORNEYS FOR RESPONDENT

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PROOF OF SERVICE

I, Donna D'Alessio, am an employee of the Respondent, hereby certify that as per the March 20, 2020 Order of the Chief Justice, the Initial Brief of Respondent, Designation of Matter, and Certificate of Service has been forwarded to Appellant's counsel, Kathrine H. Hudgins, Esq., via email today, May 27, 2020 to KHudgins@sccid.sc.gov, and to her assistant cstock@sccid.sc.gov and by depositing one copy of the same in the United States mail, postage prepaid, and addressed to his attorney of record: Kathrine H. Hudgins, Esq., SCCID/Division of Appellate Defense, 1330 Lady Street, Suite #401, Columbia, South Carolina 29201.

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

This 27th day of May, 2020.



Donna D'Alessio,
Legal Assistant to W. Joseph Maye
Assistant Attorney General

Donna D'Alessio

From: Donna D'Alessio
Sent: Wednesday, May 27, 2020 11:26 AM
To: khudgins@sccid.sc.gov
Cc: Stock, Chris (cstock@sccid.sc.gov)
Subject: Williams, Bradford Hester - Appellate Case No. 2017-001753 - 2nd extension of time to file IBOR
Attachments: Williams, Bradford Hester - Appellate Case No. 2017-001753 - Motion for Second extension of time to file IBOR (02287063xD2C78).pdf

Dear Ms. Hudgins:

Attached is a scanned copy of the Respondent's Motion for Second Extension of Time to File Initial Brief of Respondent and Designation of Matter regarding the above matter. A paper copy is being mailed to you this afternoon. The Motion for Second Extension of Time to File Initial Brief of Respondent is being submitted to the South Carolina Court of Appeals through e-filing, along with a copy of this email.

Hope you are well, and thank you.

Donna D'Alessio, Legal Assistant
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