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**Jul 24 2020**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

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Appeal from Georgetown County  
Honorable Steven H. John, Circuit Court Judge  
Appellate Case No. 2018-000622

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The State,

Respondent,

vs.

Ty'shun Mario Bessellieu,

Appellant.

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**MOTION FOR THIRD EXTENSION  
WITHIN WHICH TO SERVE AND FILE  
BRIEF OF RESPONDENT**

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

I.

The Initial Brief of Respondent and Designation of Matter are due to be served and filed July 27, 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 Respondent moves for a third extension in the above referenced appeal. Due to work required in other cases pending before this Court and the South Carolina Supreme Court, I am unable to complete this brief on time. The undersigned has completed multiple filings in the South Carolina Supreme Court, including Petitions for Rehearing and Returns to Petitions for

Certiorari. The undersigned has also completed multiple initial briefs for the Court of Appeals, as well as other filings.

III.

This extension request is not intended for purposes of delay, but rather to ensure the Brief is properly researched and prepared. The undersigned has one brief he needs to complete prior to beginning work on this appeal and does not anticipate the need for a further extension. I would therefore request a third extension of time within which to serve and file the Initial Brief of Respondent and Designation of Matter.

WHEREFORE, Respondent prays that the Court hold this matter in abeyance until ruling on this motion, and 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 from the date such relief is granted; and for such other and further relief as the Court may deem just and proper.


Respectfully submitted,

ALAN WILSON  
Attorney General

WILLIAM M. BLITCH, JR.  
Senior Assistant Deputy Attorney General

I have reviewed and approve  
this request.

  
DONALD J. ZELENKA  
Deputy Attorney General

  
WILLIAM M. BLITCH, JR.  
Senior Assistant Deputy Attorney General  
S.C. Bar No. 15608  
Office of the Attorney General  
Post Office Box 11549  
Columbia, SC 29211  
(803) 734-3727

ATTORNEYS FOR RESPONDENT

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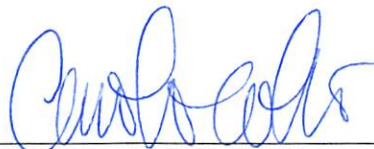
**PROOF OF SERVICE**

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I, Caroline Collins, certify that I have served the Motion For Third Extension Of Time Within Which To Serve And File Brief of Respondent on Appellant by email at the address provided in AIS for David Alexander, Esquire.

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

This 24<sup>th</sup> day of July, 2020.



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CAROLINE COLLINS  
Administrative Coordinator  
Office of Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29211  
(803) 734-3727

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Jul 24 2020

Caroline Collins

SC Court of Appeals

**From:** Caroline Collins  
**Sent:** Friday, July 24, 2020 12:58 PM  
**To:** 'David Alexander (dalexander@sccid.sc.gov)'  
**Cc:** 'Matthews, Lindsey'; William Blicht  
**Subject:** The State v. Ty'shun Mario Bessellieu (2018-000622)  
**Attachments:** BESSELLIEU Ty'shun - Motion for Third Ext. Within Which to Serve and File Brief of Respondent - 2018-000622 (02334511xD2C78).PDF

**Follow Up Flag:** Worldox

Good Afternoon Mr. Alexander,

Attached please find a copy of the Motion for Third Extension Within Which to Serve and File Brief of Respondent in The State v. Ty'shun Mario Bessellieu (2018-000622). This document will be submitted to the Court of Appeals through the AIS One Drive system.

If you will, please reply to confirm receipt of this email.

Thank you!

*Caroline Collins*

Administrative Coordinator  
South Carolina Attorney General's Office  
P: (803) 734-3723