

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

**RECEIVED**  
**Sep 09 2020**  
**SC Court of Appeals**

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Appeal from Cherokee County  
Honorable J. Derham Cole, Circuit Court Judge  
Appellate Case Tracking No. 2020-000771

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The State,

Respondent,

vs.

Cornelius Sentell Mayberry,

Defendant,

and

John Steen d/b/a John Steen Bail Bonding  
and Palmetto Surety Corp. as Surety,

Appellant.

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

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

I.

The Initial Brief of Respondent and Designation of Matter are due to be served and filed September 9, 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 second extension in the above referenced appeal. Due to the issues raised and 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 several initial briefs and multiple filings for the South Carolina Supreme Court and this Court in the last several weeks.

III.

This extension request is not intended for purposes of delay, but rather to ensure the Brief is properly researched and prepared. I would, therefore, request a second extension of time within which to serve and file the Initial Brief of Respondent.

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 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



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WILLIAM M. BLITCH, JR.  
S.C. Bar No. 15608  
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ATTORNEYS FOR RESPONDENT

September 9, 2020

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Appellant.

**PROOF OF SERVICE**

I, Caroline Collins, certify that I have served the Motion for Extension of Time to Serve and File Initial Brief of Respondent and Designation of Matter on Appellant by email to Appellant's counsel of record at the email address provided by AIS for Robert T. Williams and Jason T. Yonge.

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

This 9<sup>th</sup> day of September, 2020.



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

## Caroline Collins

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**From:** Caroline Collins  
**Sent:** Wednesday, September 9, 2020 10:11 AM  
**To:** 'twilliams@wsblegal.com'; 'jyonge@wsblegal.com'  
**Cc:** William Blicht  
**Subject:** The State v. John Steen d/b/a John Steen Bail Bonding (2020-000771)  
**Attachments:** MAYBERRY Cornelius - Motion for Ext. of Time to Serve and File Initial Brief of Respondent and Designation of Matter - 2020-000771 (02373931xD2C78).PDF

Good Morning Mr. Williams and Mr. Yonge,

Attached please find a Motion for Extension of Time to Serve and File Initial Brief of Respondent and Designation of Matter in The State v. Cornelius Mayberry and John Steen d/b/a John Steen Bail Bonding (2020-000771). This Motion will be submitted to the Court of Appeals via the AIS One Drive System.

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

Thank you!

*Caroline Collins*

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

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