

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Greenville County
Honorable Robin B. Stilwell, Circuit Court Judge
Appellate Case Tracking No. 2020-000108

RECEIVED

Oct 26 2020

SC Court of Appeals

The State,

Respondent,

vs.

Thomas Charles Felton Jones,

Appellant.

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

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

I.

The Initial Brief of Respondent and Designation of Matter were due to be served and filed October 23, 2020. The undersigned needed to be out of the office and was unable to serve this extension request. As a result, the State asks this Court to accept the motion out of time.

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, as well as participated in multiple oral arguments in the Court of Appeals.

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 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



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ATTORNEYS FOR RESPONDENT

October 26, 2020

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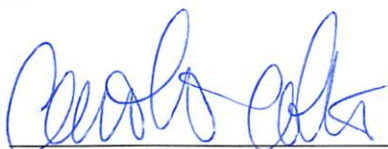
Appellant.

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 John Christopher Shipman and Andre Ta Nguyen

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

This 26th day of October, 2020.



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

Caroline Collins

From: Caroline Collins
Sent: Monday, October 26, 2020 11:20 AM
To: 'anguyen@greenvillecounty.org'
Cc: William Blicht
Subject: The State v. Thomas Charles Felton Jones (2020-000108)
Attachments: JONES Thomas - Motion Out of Time for Second Extension - 2020-000108 (02411273xD2C78).PDF

Good Morning Mr. Nguyen,

Attached please find a copy of the Motion Out of Time for Second Extension of Time to Serve and File Initial Brief of Respondent and Designation of Matter in The State v. Thomas Charles Felton Jones (2020-000108). This Motion will be submitted to the Court of Appeals today via the AIS One Drive System. In addition to this email, a hard copy of this Motion has been placed in the mail.

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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