

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED
Nov 09 2020
SC Court of Appeals

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

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.

**MOTION FOR 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:

I.

The Initial Brief of Respondent and Designation of Matter are due to be served and filed November 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 fourth 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 is currently working on this brief and anticipates having it completed without the need for any further extensions. The

undersigned has completed filings in the State v. Kevin Herriott, State v. Montrell Troutman, State v. Kenneth Taylor, State v. Ty'Shun Besselieu, State v. Miquell Bryan, State v. Morales, State v. Singleton, and State v. Strother. Additionally, the State participated in two oral arguments before this Court in October and is preparing for an oral argument in the Supreme Court in November.

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 fourth and final 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.
S.C. Bar No. 15608
Office of the Attorney General
Post Office Box 11549
Columbia, SC 29211
(803) 734-3727

ATTORNEYS FOR RESPONDENT

November 9, 2020

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

Nov 09 2020

SC Court of Appeals

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

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.

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 the Attorney Information System (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 9th day of November, 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, November 9, 2020 10:33 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 Extension of Time to Serve and File Initial Brief of Respondent and Designation of Matter - 2020-000771 (02422199xD2C78).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

RECEIVED
Nov 09 2020
SC Court of Appeals