

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Nov 12 2020

SC Court of Appeals

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Appeal from Lexington County  
Honorable William P. Keesley, Circuit Court Judge

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THE STATE,

Respondent,

v.

MICHAEL LARONE WILLIAMS,

Appellant.

Appellate Case No. 2019-001759

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

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Respondent, the State, moves this Court for an additional thirty (30) day extension of time in which to file the Initial Brief of Respondent and Designation of Matter, which is currently due to be filed today, Thursday, November 12, 2020. Opposing counsel has graciously consented to all extension requests through November 30, 2020. In support of this motion, counsel would respectfully show the Court the following:

Undersigned counsel has been scheduled to complete a number of state and federal matters within the past 30 days that include, but are not limited to, the following:

On October 5, 2020, Counsel filed a Response in Opposition to Petitioner's Motion for Reconsideration [ECF – 31] in the case of *Edward Tyler v. Warden, Kenneth Sharp*, C/A No.

9:19-cv-02421-HMH-BM, a federal habeas case currently pending in United States District Court for the District of South Carolina; Counsel has been working on Oral Argument preparation and actually presented Oral Argument in the United States Court of Appeals for the Fourth Circuit on October 28, 2020 in the case of *Vandross v. Stirling*, Appellate Case No. 18-6916, an appeal from a denial of a Petition for a Writ of Habeas Corpus; Counsel is working on the Brief of Respondent in the case of *Stokes v. Stirling*, a death penalty case pending in the United States Court of Appeals for the Fourth Circuit (Case No. 18-6) due November 23, 2020; Counsel had military duty on Friday, November 6, 2020.

Due to counsel's involvement in these and other matters in state and federal court, Counsel has been unable to complete, the Initial Brief of Respondent and Designation of Matter in this action prior to the due date prescribed. This request is made in good faith, and not for the purposes of delay. This is counsel's third request for additional time to do so.

WHEREFORE, counsel respectfully requests a thirty (30) day extension of time to serve and file the Initial Brief of Respondent and Designation of Matter.

Respectfully Submitted,

ALAN WILSON  
Attorney General


DONALD J. ZELENKA  
Deputy Attorney General

MELODY J. BROWN  
Senior Assistant Deputy Attorney General

MICHAEL D. ROSS  
Assistant Attorney General  
SC Bar No. 12990

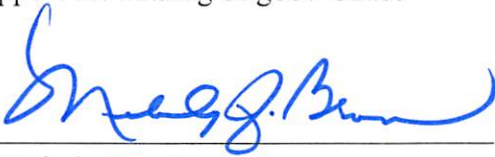
Post Office Box 11549

Columbia, South Carolina, 29211  
(803) 734-6305

By:   
MICHAEL D. ROSS  
ATTORNEYS FOR RESPONDENT

November 12, 2020.

I support the finding of good Cause

By:   
Melody Jane Brown  
Senior Assistant Deputy Attorney General

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**CERTIFICATE OF SERVICE**

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I, Brandy Rankin, as an employee of the Respondent, hereby certify that as per the March 20, 2020 Order of the Chief Justice, the Third Extension to file the Initial Brief of Respondent and Designation of Matter, and Certificate of Service have been forwarded to Appellant's counsel, Adam S. Ruffin, Esq., via email today, November 12, 2020 to [aruffin@sccid.sc.gov](mailto:aruffin@sccid.sc.gov) and to Mr. Ruffin's assistant, Scott Leverett, [sleverett@sccid.sc.gov](mailto:sleverett@sccid.sc.gov).

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

This 12th day of November, 2020.

*Brandy Rankin*

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Brandy Rankin  
Legal Assistant to Caroline Scrantom  
Assistant Attorney General

**Brandy Rankin**

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**To:** aruffin@sccid.sc.gov; sleverett@sccid.sc.gov  
**Cc:** Mike Ross; Melody Brown  
**Subject:** Motion for Extension - Michael Larone Williams - 2019-001759  
**Attachments:** THIRD MOTION FOR EXTENSION TO FILE IBOR & DOM, 11-12-20 (02424586xD2C78).pdf

Dear Mr. Ruffin,

Please find attached the Respondent's third Motion for Extension in which to file the Initial Brief and Designation of Matter. Thank you.

*Brandy Rankin*

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