

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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Dec 01 2020

SC Court of Appeals

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

The State,

Respondent,

vs.

Thomas Charles Felton Jones,

Appellant.

**MOTION FOR THIRD 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 are due to be served and filed today, December 1, 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 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 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, State v. Strother, State v. Tyreek Hayes, and State v. Angela Brewer. Additionally, the State participated in two oral arguments before this Court in October and 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 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:

/s/Donald J. Zelenka
DONALD J. ZELENKA
Deputy Attorney General



WILLIAM M. BLITCH, JR.
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ATTORNEYS FOR RESPONDENT

December 1, 2020

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PROOF OF SERVICE

I, Caroline Collins, certify that I have served the Motion for Third 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 1st day of December, 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: Tuesday, December 1, 2020 11:01 AM
To: 'anguyen@greenvillecounty.org'; 'cshipman@greenvillecounty.org'
Cc: William Blich
Subject: The State v. Thomas Charles Felton Jones (2020-000108)
Attachments: JONES Thomas - Motion for Third Extension - 2020-000108 (02437738xD2C78).PDF

Good Morning Mr. Nguyen and Mr. Shipman,

Attached please find a copy of the Motion for Third 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 will be 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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