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SC Court of Appeals

**STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

**Appeal from Greenville County
Honorable Robin B. Stilwell, Circuit Court Judge**

THE STATE,

Respondent,

v.

WILLIAM SHANE FORDHAM BROWN,

Appellant.

Appellate Case No. 2019-001456

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

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, Friday, December 4, 2020. Opposing counsel has graciously consented to all extension requests through December 31, 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: the filing of the Return and Memorandum of Law in Support of Motion for Summary Judgment in the matter of Allen Bobo, #367299 vs. Warden of Evans Correctional Institution, C/A No. 1:20-cv-3078-

TMC-SVH, a federal habeas matter pending the United States District Court for the District of South Carolina (November 3, 2020); oral argument in the matter of The State vs. Charles Tillman, Appellate Case No. 2018-000495, before this Court on November 4, 2020; the filing of the Return and Memorandum of Law in Support of Motion for Summary Judgment and a Response in Opposition to Petitioner's Motion for Bond in the matter of James R. Rose, #293938 v. Warden, McCormick Correctional Institution, C/A No. 1:20-2921-RBH-PJG, a federal habeas matter pending in the United States District Court for the District of South Carolina (November 12, 2020); the filing of the Return to Petition for Writ of Certiorari in the matter of The State v. Jaron Lamont Gibbs, Appellate Case No. 2020-001399, a Pickens County murder appeal pending in the Supreme Court of South Carolina (November 18, 2020); and the filing the Initial Brief of Respondent and Designation of Matter in the matter of The State v. Leandra L. Bright, a Charleston County murder appeal pending in this court (November 18, 2020). Counsel is also presently preparing for oral argument before this Court this coming Monday, December 7, 2020, in the matter of The State v. Jane Katherine Hughes, Appellate Case No. 2018-000659.

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 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
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By: s/Caroline Scrantom
CAROLINE SCRANTOM
ATTORNEYS FOR RESPONDENT

December 4, 2020.

I support the finding of good Cause

By: 
William Blich
Senior Assistant Deputy Attorney General

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WILLIAM SHANE FORDHAM BROWN,

Appellant.

CERTIFICATE OF SERVICE

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, khudgins@sccid.sc.gov, Esq., via email today, December 4, 2020 and to Ms. Hudgins's assistant, Chris Stock, cstock@sccid.sc.gov.

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

This 4th day of December, 2020.



Brandy Rankin
Legal Assistant to Caroline Scrantom
Assistant Attorney General