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Feb 03 2021

SC Court of Appeals

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

**Appeal from Horry County
Honorable Paul M. Burch, Circuit Court Judge**

THE STATE,

Respondent,

v.

CALVIN D. FORD,

Appellant.

Appellate Case No. 2019-001912

**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, Wednesday, February 3, 2021. Opposing counsel has graciously consented to all extension requests through February 28, 2021. 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 Final Briefs of Respondent in this Court in the matters of The State v. Nyquan Brown, Appellate Case No. 2019-001960 (January 4, 2021), and The State vs. Leandra Bright, Appellate Case No.

2019-001960 (January 6, 2021); the filing of the Return to Petition for Writ of Certiorari in the South Carolina Supreme Court in the matter of The State v. Mimi Joe Marshall, Appellate Case No. 2020-001546 (January 13, 2021); and the filing of the Motion for Summary Judgment and the Return and Memorandum in Support of Summary Judgment to the Petition for Writ of Habeas Corpus in the United States District Court in the matter of David A. Dickerson, #369461 vs. Michael Stephan, Warden (January 22, 2021). Counsel is also today filing the Initial Brief and Designation of Matter in this Court in the matter of The State vs. William Shane Fordham Brown, Appellate Case No. 2019-001456, which is on its fourth extension of time for completion (February 3, 2021).

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 fourth 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

CAROLINE SCRANTOM
Assistant Attorney General
SC Bar No. 101357

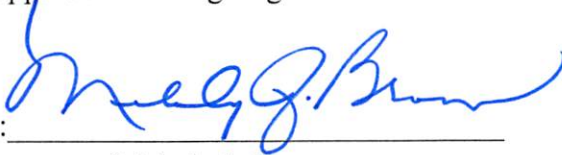
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Columbia, South Carolina, 29211
(803) 734-6305

By: 
CAROLINE SCRANTOM
ATTORNEYS FOR RESPONDENT

February 3, 2021.

I support the finding of good Cause

By: 

Melody J. Brown,
Senior Assistant Deputy Attorney General

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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, Shackett@sccid.sc.gov, Esq., via email today, February 3, 2021 and to Ms. Hackett's assistant, Kat Kasperski, kkasperski@sccid.sc.gov.

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

This 3rd day of February, 2021.



Brandy Rankin,
Legal Assistant to Caroline Scrantom
Assistant Attorney General