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Mar 05 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 FOURTH 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, March 5, 2021. Opposing counsel has graciously consented to all extension requests through March 31, 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 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, (February 3, 2021); the filing of the Reply to

Objections to Report and Recommendation in the United States District Court in the matter of James R. Rose vs. Warden McCormick Correctional Institution (February 17, 2021); and today's filing of the Motion for Summary Judgment and the Return and Memorandum in Support of Summary Judgment to Petition for Writ of Habeas Corpus in the matter of Kenneth J. Bell, #356689 v. Warden of Allendale Correctional Institution pending in the United States District Court (March 5, 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. Counsel begun work on the Initial Brief and Designation of Matter in the instant case, and is awaiting receipt of copies of exhibits from Horry County which are necessary for review prior to the brief's completion. Receipt of these exhibits has been delayed.

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

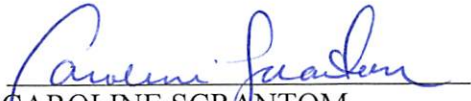
DONALD J. ZELENKA
Deputy Attorney General

MELODY J. BROWN
Senior Assistant Deputy Attorney General

CAROLINE SCRANTOM
Assistant Attorney General
SC Bar No. 101357

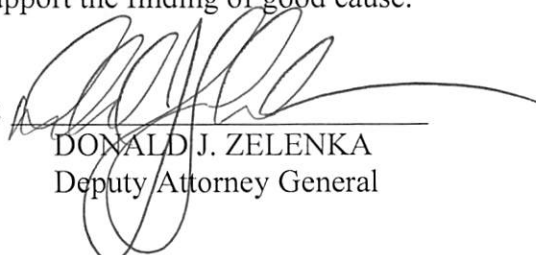
Post Office Box 11549

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

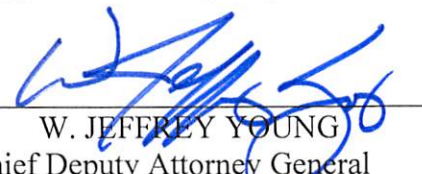
By: 
CAROLINE SCRANTOM
ATTORNEYS FOR RESPONDENT

March 5, 2021
Columbia, South Carolina

I support the finding of good cause.

By: 
DONALD J. ZELENKA
Deputy Attorney General

I too support the finding of good cause.

By: 
W. JEFFREY YOUNG
Chief 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 Fourth 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, March 5, 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 5th day of March 2021.



Brandy Rankin,
Legal Assistant to Caroline Scrantom
Assistant Attorney General

Brandy Rankin

To: shackett@sccid.sc.gov
Cc: Kasperski, Katriel; Caroline Scramton; Melody Brown
Subject: Calvin D. Ford - Appellate Case No. 2019-001912 - Fourth Motion for Extension to File Initial Brief and Designation of Matter
Attachments: Scanned copy of Approved Word 4th Extension to file Initial Brief and Designation of Matter, Calvin Ford (02507013xD2C78).pdf

Dear Ms. Hackett,

Please find attached the Respondent's fourth Motion for Extension to file the Initial Brief and Designation of Matter. This Motion will be filed with the South Carolina Court of Appeals today along with a copy of this email.

Sincerely,

Brandy Rankin

Legal Assistant
Office of the Attorney General
Post Office Box 11549
Columbia, SC 29211-1549

BrandyRankin@scag.gov
Phone: 803-734-6305
Fax: 803-734-4035