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Mar 05 2021

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Fairfield County
Honorable Thomas A. Russo, Circuit Court Judge
Appellate Case Tracking No. 2020-000130

The State,

Respondent,

vs.

Levond T. Keitt,

Appellant.

**MOTION FOR FOURTH 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:

I.

The Initial Brief of Respondent and Designation of Matter are due to be served and filed today, March 5, 2021. 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 fourth 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, in addition to his other duties as supervisor of the Criminal Appeals Section, an Initial Brief of Respondent in State v. Jones (Feb. 2), an Initial Brief of Respondent in a murder appeal in State v. Duncan (Feb. 4), a Return to a Petition for Writ of Certiorari in a case inherited from another attorney in State v. Busse (Feb. 16), a Brief of Petitioner for the South Carolina

Supreme Court in State v. Taylor (Feb. 17), an Initial Brief of Respondent in State v. Goodwin (Feb. 24), and another Return to a Petition for Writ of Certiorari in an inherited case in State v. Middleton (Mar. 4). Additionally, the undersigned participated in oral argument in State v. Morales on February 9 and is the main technical assistance for all oral arguments conducted in the Attorney General's Office.

II.

This extension request is not intended for purposes of delay, but rather to ensure the Brief is properly researched and prepared. I am currently working on this Brief and do not anticipate needing any additional extensions. I would, therefore, request a fourth extension of time within which to serve and file the Initial Brief of Respondent and Designation of Matter.

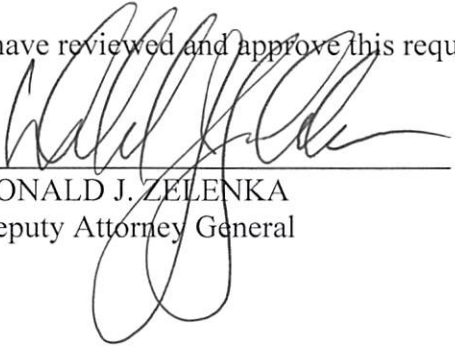
WHEREFORE, Respondent prays that the Court hold this matter in abeyance until ruling on this motion, and extend the deadline for the service and filing of the Initial Brief of Respondent and Designation of Matter in this case for thirty (30) days from the date such relief is granted; and for such other 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:



DONALD J. ZELENKA
Deputy Attorney General



WILLIAM M. BLITCH, JR.
S.C. Bar No. 15608
Office of the Attorney General
Post Office Box 11549
Columbia, SC 29211
(803) 734-3727

March 5, 2021

ATTORNEYS FOR RESPONDENT

STATE OF SOUTH CAROLINA
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PROOF OF SERVICE

I, Caroline Collins, certify that I have served the Motion for Fourth 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, Victor R. Seeger, at the email address provided by the Attorney Information System (AIS).

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

This 5th day of March, 2021.



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: Friday, March 5, 2021 11:11 AM
To: Seeger, Victor
Cc: 'Stock, Chris'; William Blich
Subject: The State v. Levond T. Keitt (2020-000130)
Attachments: KEITT Levond - Motion for Fourth Extension - 2020-000130 (02506794xD2C78).PDF

Good Morning Mr. Seeger,

Attached please find a Motion for Fourth Extension of Time to Serve and File Initial Brief of Respondent and Designation of Matter in The State v. Levond T. Keitt (2020-000130). This motion will be submitted to the South Carolina Court of Appeals today via the AIS One Drive System.

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