

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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ON CERTIORARI TO LEXINGTON COUNTY  
Court of Common Pleas

The Honorable Eugene C. Griffith, Jr., Post-Conviction Relief Judge

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Appellate Case No. 2017-001718

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**RECEIVED**  
**Mar 12 2021**  
SC Court of Appeals

WILLIAM BRUCE JUSTICE,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT.

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**MOTION FOR FOURTH EXTENSION TO FILE BRIEF OF RESPONDENT**

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Respondent, the State, moves this Court for an additional thirty-day extension of time in which to file the Brief of Respondent, **up to and including April 12, 2021**. This is Respondent's fourth request for an extension of time in which to file the brief. In support of the request, undersigned counsel would respectfully show this Court:<sup>1</sup>

1. The Brief of Respondent is due to be filed with this Court on Friday, March 12, 2021. The Court has granted Respondent three previous extensions.
2. This is the fourth request for an extension of time in which in which to file a response.

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<sup>1</sup> In compliance with: *In Re: Extensions in Criminal and Post-Conviction Relief Cases*, (S.C. Sup. Ct. order dated March 18, 2009) (Davis Adv. Sh. No. 13 at 1).

3. Counsel did not handle the case below and was assigned the case after this Court granted certiorari. Accordingly, based on the issues raised, Counsel has spent a significant amount of time researching and reviewing the record.
4. Over the past month, Counsel has filed a Petition for Writ of Certiorari in O'Shaun Robinson v. State (2020-001361).
5. Counsel has filed Returns in the Circuit Court for Corey Whitten v. State (2020-CP-37-0932); Edna Sluder v. State (2020-CP-37-0807); Heather Lawson v. State (2020-CP-32-3026); Eric Patrick v. State (2016-39-CP-0989); and Yusef Musa Banshee v. State (2020-CP-19-0091); Jeffrey Timpson v. State (2019-CP-04-2358); and Eugene McDonald v. State, (2020-CP-32-2672).
6. Counsel has drafted and submitted a proposed Order of Dismissal for Jaquese Hyatt v. State (2016-CP-23-485) and proposed Conditional Orders of Dismissal for Eric Patrick v. State (2016-39-CP-0989); and Yusef Musa Banshee v. State (2020-CP-19-0091); Jeffrey Timpson v. State (2019-CP-04-2358); and Eugene McDonald v. State, (2020-CP-32-2672).
7. Since Counsel's last request for an extension, Counsel has prepared for and represented Respondent in a Post-Conviction Relief term held in the 13<sup>th</sup> Circuit on March 1–5, 2021, before the Honorable R. Scott Sprouse.
8. Counsel is simultaneously preparing for the upcoming term of Post-Conviction Relief in the 11<sup>th</sup> Circuit, to be held April 26-30, 2021. Since this will be the first Post-Conviction Relief term in the 11<sup>th</sup> Circuit since the Chief Justice's Order resuming in-person proceedings, Counsel has been diligently working with SCDC and the presiding judge on logistical issues associated with preparing the roster.

9. Greater specificity as to the undersigned's workload can be provided upon request.

The undersigned counsel submits this extension request is supported by extraordinary circumstances and is not intended for purposes of delay. The undersigned is currently working on the brief and hopes to have it completed shortly. The undersigned therefore requests an extension of time within which to serve and file the brief.

THEREFORE, undersigned counsel for Respondent respectfully requests a **fourth and final thirty-day extension** until **Monday, April 12, 2021**, in which to complete and file the Brief of Respondent based upon the above exigent circumstances. Counsel for Petitioner has graciously consented to this extension request by way of interagency agreement between Appellate Defense and Respondent.

Respectfully submitted,

s/LillianMeadows  
LILLIAN L. MEADOWS  
Assistant Attorney General  
S.C. Bar # 103665  
Office of the Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29211  
(803) 734-0964  
Attorney for Respondent

**We concur that extraordinary circumstances  
have been shown**

s/MeganJameson  
MEGAN HARRIGAN JAMESON  
Senior Assistant Deputy Attorney General

s/DonZelenka  
DONALD J. ZELENKA  
Deputy Attorney General

This 12<sup>th</sup> day of March, 2021.

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**PROOF OF SERVICE**

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Pursuant to the Supreme Court's Order "RE: Operation of the Appellate Courts During the Coronavirus Emergency," dated March 20, 2020, the undersigned hereby certifies a true copy of the motion for fourth extension to file the Brief of Respondent has been served upon opposing counsel, Taylor D. Gilliam, Esquire, by sending to opposing counsel's primary e-mail address as listed in the Attorney Information System (AIS):

**Taylor D. Gilliam, Esquire**  
**tgilliam@sccid.sc.gov**

This 12<sup>th</sup> day of March, 2021.

s/LillianMeadows  
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