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Apr 02 2021

SC Court of Appeals

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Dorchester County  
Honorable Diane Schafer Goodstein, Circuit Court Judge  
Appellate Case No. 2020-000095

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THE STATE,

Respondent,

vs.

KEUNTE D. COBBS,

Appellant.

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**MOTION FOR FOURTH EXTENSION OF TIME WITHIN WHICH  
TO SERVE AND FILE INITIAL BRIEF OF RESPONDENT  
AND DESIGNATION OF MATTER**

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Respondent (“the State”), through its undersigned counsel, would respectfully show unto the Court as follows:

**I.**

The Initial Brief of Respondent and Designation of Matter are due to be served and filed on April 2, 2021.

**II.**

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 State moves for a **fourth** and **final** extension in the above-referenced criminal appeal and asks for an additional thirty days to complete the brief in this case. Yesterday, the undersigned counsel submitted an Initial Brief of Respondent to the Court of Appeals in State v.

Antonio Ricardo Lee. Furthermore, in the past few weeks and months, the undersigned counsel has the undersigned counsel participated in oral argument at the Supreme Court in State v. William D. Lewis, which required significant preparation because it involved—amongst other issues—a constitutional challenge to South Carolina’s misconduct of a public officer statute; has participated in oral argument at the Court of Appeals in State v. Gregg Pickrell; has submitted a Petition for Writ of Certiorari to the Supreme Court in State v. Randy Wright; has submitted a Brief of Petitioner to the Court of Appeals in Joshua A. Reed v. State; has submitted an Initial Brief of Respondent to the Court of Appeals in State v. Shi Heme Raquan Price, State v. Elizabeth Leanne Howze, and State v. Charles Davenport, Jr.; has submitted a Petition for Rehearing to the Court of Appeals in State v. Ontavious Derenta Plumer; and has submitted a lengthy Return in Opposition to Motion for Appeal Bond in State v. Kayla Marie Cook.

### III.

The undersigned counsel submits this extension request is supported by extraordinary circumstances and is not intended for purposes of delay. To date, the undersigned counsel has been unable to complete the Brief in this case due to work required in other cases along with his other responsibilities in the office. Beyond that, the Brief in the above-referenced case has required significant research because the case involves both a claim of a violation of a constitutional right and a multi-pronged attack to the trial judge’s denial of a directed verdict motion. The undersigned counsel is currently working on the Brief in this case and intends to have it finished in a timely manner. However, the undersigned counsel has not yet been able to finish the Brief. Accordingly, in order to ensure the Brief is properly researched and prepared, I would therefore request one final extension of time within which to serve and file the Brief.

**WHEREFORE**, Respondent prays that the Court extend the deadline for the service and filing of the Initial Brief of Respondent and Designation of Matter in this case for thirty days from the date such relief is granted; hold the matter in abeyance pending a ruling on Respondent's motion; and grant such other and further relief as the Court may deem just and proper.

Respectfully submitted,

ALAN WILSON  
Attorney General

MARK R. FARTHING  
Senior Assistant Attorney General

By: 

Mark R. Farthing  
S.C. Bar Number 76901

I have reviewed and approved this extension request.

By: 

William M. Blich, Jr.  
Senior Assistant Deputy Attorney General

By: 

Donald J. Zelenka  
Deputy Attorney General

April 2, 2021

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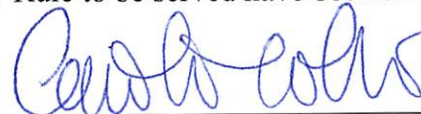
**PROOF OF SERVICE**

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I, Caroline Collins, certify I have served the within Motion for Fourth Extension of Time Within Which to Serve and File Initial Brief of Respondent and Designation of Matter on Appellant by sending an electronic copy via email to the address listed in AIS for the following individual:

C. Rauch Wise, Esq.  
Attorney at Law  
305 Main Street  
Greenwood, SC 29646

I further certify all parties required by Rule to be served have been served.  
This 2nd day of April, 2021.



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CAROLINE COLLINS  
Administrative Coordinator  
South Carolina Office of the Attorney General

## Caroline Collins

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**From:** Caroline Collins  
**Sent:** Friday, April 2, 2021 10:34 AM  
**To:** Rauch Wise  
**Cc:** Mark Farthing; William Blicht  
**Subject:** The State v. Keunte D. Cobbs (2020-000095)  
**Attachments:** Cobbs.Fourth Extension Request (IBOR) 2020-000095 (02531444xD2C78).PDF

Good Morning Mr. Wise,

Attached please find a copy of the Motion for Fourth Extension of Time Within Which to Serve and File Initial Brief of Respondent and Designation of Matter in The State v. Keunte D. Cobbs (2020-000095). This motion will be submitted to the 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