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Jul 15 2021

SC Court of Appeals

STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Beaufort County
The Honorable R. Scott Sprouse, Circuit Court Judge

JAQUWN BREWER,

Petitioner,

v.

STATE OF SOUTH CAROLINA,

Respondent.

Appellate Case No. 2017-002494

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

The undersigned counsel would respectfully request a thirty (30) day extension in which to file the Brief of Respondent in the above-referenced case. Counsel for Petitioner, Tommy A. Thomas has graciously consented to this request. In support of this motion, counsel would respectfully show the Court the following:

The Brief of Respondent is due be served and filed on or before July 16, 2021 as per this Court's Order dated June 23, 2021 granting Respondent's third extension request. The undersigned attorney for the Respondent has had a number matters to attend since June 16, 2021. Specifically,

1. Counsel will file the Return to Petition for Writ of Habeas Corpus in the matter of Ray Charles Degraffenreid v. State of South Carolina, an original jurisdiction matter currently pending in the South Carolina Supreme Court on today's date;

2. Counsel also prepared and filed the Respondent's Status Report in the matter of Joshua Jeter v. Warden, Perry Correctional Institution, C/A No. 2:13-cv-460-BHH-MGB, on July 12, 2021;

3. As Deputy Attorney General of the Criminal Division, counsel has the responsibility to review and assign all prosecution conflict matters within the Division. Within the last thirty (30) days, counsel has reviewed and assigned forty-nine (49) conflict matters; and

4. Finally, Counsel has also done a substantial amount of researching the issues to prepare the Brief of Respondent in this matter.

However, due to counsel's involvement in these and other matters, counsel is unable to timely complete the Brief of Respondent.

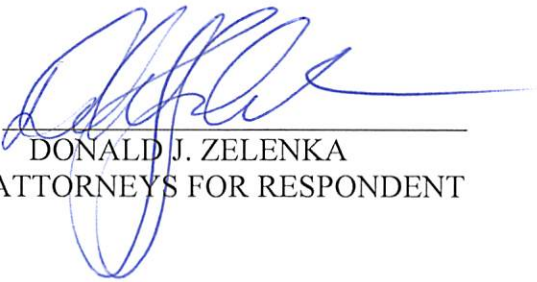
WHEREFORE, counsel respectfully requests a thirty (30) day extension of time to serve and file the Brief of Respondent up to and including August 16, 2021. This request is made in good faith, and not for the purposes of delay.

Respectfully Submitted,

ALAN WILSON
Attorney General


DONALD J. ZELENKA
Deputy Attorney General

Post Office Box 11549
Columbia, South Carolina 29211
(803) 734-6305

By: 
DONALD J. ZELENKA
ATTORNEYS FOR RESPONDENT

July 15, 2021.

I support the finding of good cause.

By: 
W. Jeffrey Young,
Chief Deputy Attorney General

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CERTIFICATE OF SERVICE

I, Angela Brown, am an employee of the Respondent, hereby certify that as per the March 20, 2020 Order of the Chief Justice, the Motion for Fourth Extension of Time, and Certificate of Service has been forwarded to Petitioner's counsel, Tommy A. Thomas, Esquire via email today, July 15, 2021 to thomaslaw@me.com.

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

This 15th day of July, 2021.

s/ Angela Brown

Angela Brown
Legal Assistant to Melody J. Brown
Senior Assistant Deputy Attorney General

Angela Brown

From: Angela Brown
Sent: Thursday, July 15, 2021 2:26 PM
To: 'thomaslaw@me.com'
Cc: Don Zelenka
Subject: Jaquwn Brewer v. State of South Carolina
Attachments: 02645628.pdf

Follow Up Flag: Worldox

Mr. Thomas, please find attached the State's Motion for Extension of Time to File the Brief of Respondent in the matter of Jaquwn Brewer v. State of South Carolina. The motion will be electronically filed with the South Carolina Court of Appeals on today's date.

Thank you,

Angela Bennett Brown
Administrative Coordinator
Criminal Division
(803) 734-0368

Office of the Attorney General
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