

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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Appeal from Richland County  
The Honorable James R. Barber, III, Circuit Court Judge

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The State of South Carolina,

Respondent

v.

Anthony Hackshaw,

Appellant.

**RECEIVED**  
MAY 23 2012  
SC Court of Appeals

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**MOTION FOR SECOND EXTENSION OF TIME TO FILE  
INITIAL BRIEF OF RESPONDENT AND DESIGNATION OF MATTER**

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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. This is Respondent's second request for an extension of time in which to file the brief. In support of the request, undersigned counsel would respectfully show the Court:

1. Undersigned counsel for Respondent has been scheduled for a number of state and federal matters in the last thirty (30) days, that include, but are not limited to, the following: completed and filed an Initial Brief of Respondent in a non-capital murder direct appeal before the South Carolina Court of Appeals (*Roger Bruce*); completed and filed a Final Brief of Respondent in another non-capital murder direct appeal before the South Carolina Court of Appeals (*Allen Joe Gathings*); prepared for and presented an oral argument in the Supreme Court of South Carolina in an additional non-capital murder direct appeal (*Gregory Daniels*); completed and filed an Initial Brief of Respondent in another non-capital murder direct appeal before the South Carolina Court of Appeals (*David Chavez*); completed and filed a return and memorandum of law in support of motion for

summary judgment in a federal habeas action (*Willie Gordon*); met with trial counsel and prosecutors in a death penalty matter in Conway, South Carolina on May 17, 2012 (*Louis Winkler*); attended the South Carolina Prosecution Coordination Death Penalty Conference from May 21-23, 2012; and, completed and filed a return and memorandum of law in support of motion for summary judgment in an additional federal habeas action today (*Edward Lee Cross*).

2. Due to his heavy case load, undersigned counsel for Respondent has not been able, in a timely fashion, to complete the initial brief in this appeal.

THEREFORE, undersigned counsel for Respondent respectfully requests an additional extension of thirty (30) days to complete the Initial Brief of Respondent and Designation of Matter.

Respectfully submitted,

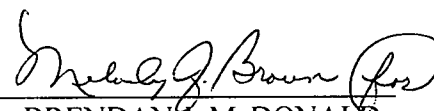
ALAN WILSON  
Attorney General

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BY:   
BRENDAN J. McDONALD

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May 23, 2012.  
Columbia, South Carolina.

ATTORNEYS FOR RESPONDENT

STATE OF SOUTH CAROLINA  
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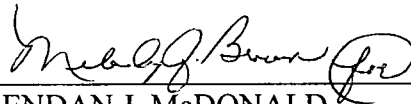
**PROOF OF SERVICE**

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I, Brendan J. McDonald, certify that I have served Respondent's Motion for a Second Extension of Time on counsel for Appellant, by depositing one copy of same in the United States mail, postage prepaid, to counsel for appellant, addressed as follows:

Elizabeth A. Franklin-Best, Appellate Defender  
South Carolina Office of Indigent Defense  
Post Office Box 11589  
Columbia, South Carolina 29211-1433

This 23<sup>rd</sup> day of May, 2012.



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BRENDAN J. McDONALD  
Office of Attorney General  
Post Office Box 11549  
Columbia, SC 29211  
(803) 734-6305

ATTORNEY FOR RESPONDENT



ALAN WILSON  
ATTORNEY GENERAL

May 23, 2012

The Honorable Jenny A. Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

Re: The State v. Anthony Hackshaw  
Appeal from Richland County

Dear Ms. Kitchings:

Enclosed please find the original and six (6) copies of the Respondents' Motion for Second Extension of Time to file Initial Brief of Respondent and Designation of Matter, dated May 23, 2012, together with a Proof of Service in the above-referenced matter.

Thank you for your assistance in this matter. Please call this office if you need any additional information.

Sincerely,

Brendan J. McDonald  
Assistant Attorney General

BJM/arb

cc: Susan Hackett, Appellate Defender

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