

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

ON WRIT OF CERTIORARI TO GEORGETOWN COUNTY
Court of Common Pleas

The Honorable D. Craig Brown, Trial Judge
The Honorable Kristi F. Curtis, PCR Judge

Appellate Case No. 2022-001326

RECEIVED

Jan 27 2023

S.C. SUPREME COURT

STANLEY MOULTRIE,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT.

**MOTION FOR THIRD EXTENSION TO FILE
RETURN TO PETITION FOR WRIT OF CERTIORARI AND RETURN TO AUSTIN
PETITION FOR WRIT OF CERTIORARI**

COMES NOW, Respondent, by and through the undersigned counsel, making its motion for an additional thirty (30) day extension of time to file the return to petition for writ of certiorari and return to Austin petition for writ of certiorari, up to February 27, 2023. This is Respondent's third request for an extension of time in which to file these returns. In support of this request, undersigned counsel would respectfully show unto this Court¹:

1. The returns to the petitions for writ of certiorari in this case are due to be filed with the Court today. The Court has granted counsel two previous extensions.

¹ 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).

2. This is the third request for an extension of time in which to file these returns.
3. Counsel was reassigned this case January 19, 2023.
4. Due to work required in other cases pending before this Court and the Court of Appeals, Counsel has not yet been able to dedicate the necessary time to prepare these returns.
5. Counsel intends to prioritize these returns going forward.

In short, this extension request is not intended for purposes of delay, but rather to ensure that the returns are properly researched and prepared. The undersigned is currently working on these returns and hopes to have them completed shortly. The undersigned therefore requests an extension of time within which to serve and file these returns. THEREFORE, undersigned counsel for Respondent respectfully requests a **third, thirty-day extension**, in which to complete and file the return to petition for writ of certiorari and return to Austin petition for writ of certiorari in this case based upon the above exigent circumstances.

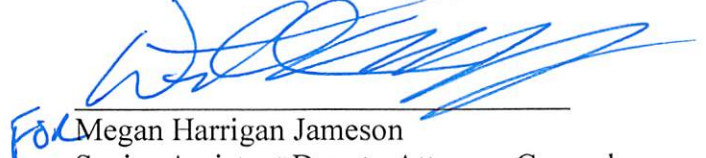
Respectfully submitted,

BY:



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**I concur that extraordinary
circumstances have been shown.**



FOL Megan Harrigan Jameson
Senior Assistant Deputy Attorney General
S.C. Bar No. 100108

January 27, 2023

ATTORNEYS FOR RESPONDENT