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STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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S.C. SUPREME COURT

On Petition for Writ of Certiorari to Marion County  
Honorable D. Craig Brown, Trial Judge  
Honorable William H. Seals, Jr., Post-Conviction Relief Judge

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Appellate Case No. 2023-000121

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RICHARD A. WOODBURY, SCDC # 358878,

Petitioner,

v.

STATE OF SOUTH CAROLINA,

Respondent.

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**MOTION FOR A SECOND EXTENSION OF TIME TO SERVE  
AND FILE THE RETURN TO PETITION FOR WRIT OF CERTIORARI**

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Counsel for Respondent respectfully requests an extension of thirty (30) days in which to serve and file the Return to Petition for Writ of Certiorari in this case. This motion is made pursuant to the South Carolina Supreme Court Order dated March 18, 2009. This is a second request for an extension. In support of this request, counsel shows;

1. The Return to Petition for Writ of Certiorari is due to be served and filed with the Court today.
2. Counsel for Respondent respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions previously granted and the order in which counsel attempts to manage his heavy caseload, counsel hopes that no further extension requests will be required.

3. Counsel had a term of court on August 28 – September 1, 2023, in the Sixth Judicial Circuit, in which Counsel is preparing orders.
4. Counsel had a term of court on September 11 – 15, 2023, in the Fifth Judicial Circuit, in which Counsel is preparing orders.
5. Counsel has a term of court on October 30 – November 3, 2023, in Florence County, which Counsel is preparing approximately twenty-one cases to move forward that week.
6. This extension request is made in good faith and not intended for delay, but rather due to counsel's heavy workload and to ensure the return is properly researched and prepared.
7. Opposing counsel has graciously consented to this request via email and inter-agency agreement.

WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension, in which to serve and file the Return to Petition for Writ of Certiorari in this case based upon the above exigent circumstances.

Respectfully submitted,

ALAN WILSON  
Attorney General

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October 16, 2023

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