

STATE OF SOUTH CAROLINA
In The Supreme Court

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Jul 24 2024

On Petition for Writ of Certiorari to Richland County Court of Common Pleas
Honorable DeAndrea G. Benjamin, Trial Judge
Honorable Daniel Coble, PCR Judge

S.C. SUPREME COURT

Appellate Case No. 2023-001526

ANDRE T. HEATLEY, JR., #378998,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT.

**MOTION FOR SECOND EXTENSION TO FILE RETURN TO PETITION
FOR WRIT OF CERTIORARI AND MOTION TO FILE OUT OF TIME**

Respondent, the State of South Carolina, moves this Court, out of time, for a second thirty-day extension of time in which to file the Return to Petition for Writ of Certiorari, up to and including **August 21, 2024**. This is Respondent's second request for an extension in which to file the return, which was due to be filed and served on July 22, 2024. Due to a calendaring error, the undersigned counsel missed the deadline.

This extension request is not intended for purposes of delay but rather is due to counsel's heavy workload and to ensure the brief is properly researched and prepared. Opposing counsel has graciously consented to this request via email and inter-agency agreement.

WHEREFORE, undersigned counsel for Respondent respectfully requests a second **thirty-day extension** until **July 21, 2024**, in which to complete and file the Return to Petition for Writ of Certiorari in this case based upon the above circumstances.

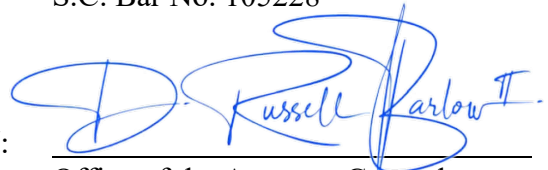
Respectfully submitted,

ALAN WILSON
Attorney General

DONALD J. ZELENKA
Deputy Attorney General

D. RUSSELL BARLOW, II
Assistant Attorney General
S.C. Bar No. 105228

BY:



Office of the Attorney General
Post Office Box 11549
Columbia, SC 29211
(803) 734-3737

July 24, 2024

ATTORNEYS FOR RESPONDENT