

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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**Oct 03 2024**

APPEAL FROM CHEROKEE COUNTY  
Court of Common Pleas

**S.C. SUPREME COURT**

J. Mark Hayes, II, Circuit Court Judge

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Appellate Case No. 2024-000128  
Case No. 2017-CP-11-00801

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Thomas Anthony Styla, Respondent-Petitioner,

v.

State of South Carolina, Petitioner-Respondent.

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**MOTION FOR EXTENSION TO FILE RETURN  
OF RESPONDENT-PETITIONER TO STATE'S  
PETITION FOR WRIT OF CERTIORARI**

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COMES NOW, Jack B. Swerling, attorney for the Respondent-Petitioner, Thomas Anthony Styla, requesting an extension to file the return of the Respondent-Petitioner to the petition for writ of certiorari filed by the State as Petitioner-Respondent. Counsel previously requested two prior extensions of the deadline for the return, and the Court granted the most recent extension to October 4, 2024. Counsel respectfully requests an additional extension of thirty days to file the return to the State's petition for writ of certiorari, to November 4, 2024.

Over the past month, counsel has been under a heavy court schedule, including but not limited to a murder trial in Greenwood County that began Monday, September 23, continued through Thursday when the trial was delayed due to Hurricane Helene's arrival, and which was

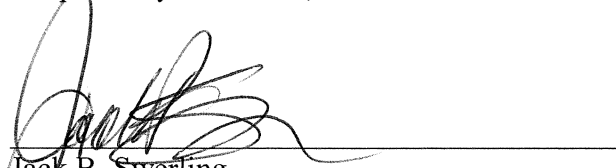
resumed Wednesday, October 2. It is expected this trial will continue at least through Friday, October 4. Due to counsel's trial schedule and heavy workload, and the disruption caused by the hurricane and continuation throughout this week of the current trial, counsel will be unable to meet the October 4 deadline for the Respondent-Petitioner's return to the State's petition for writ of certiorari. These circumstances constitute good cause for the grant of a third extension, and the requirement of the Court's order of March 18, 2009, regarding extensions in PCR proceedings is met.

This extension request is made in good faith and not for the purpose of delay, but for good cause due to counsel's current workload and trial schedule, together with the disruption caused by the hurricane.

Counsel is a sole practitioner, therefore only one signature appears on this motion.

WHEREFORE, for good cause shown, counsel respectfully requests a thirty-day extension of time to serve and file the Respondent-Petitioner's return to the State's petition for writ of certiorari, to November 4, 2024.

Respectfully submitted,



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