

STATE OF SOUTH CAROLINA

In The Supreme Court

\_\_\_\_\_  
Certiorari to Greenville County  
Honorable J. Durham Cole, Circuit Court Judge

\_\_\_\_\_  
Appellate Case No. 2024-000161

**RECEIVED**

**Oct 24 2024**

S.C. SUPREME COURT

KEVIN MARK WILLSON, ..... PETITIONER,

v.

THE STATE OF SOUTH CAROLINA, .....RESPONDENT.

\_\_\_\_\_  
**MOTION TO FILE EXTENSION REQUEST OUT OF TIME  
&  
RESPONDENT’S MOTION FOR EXTENSION OF TIME TO FILE  
THE RETURN TO PETITION FOR CERTIORARI**  
\_\_\_\_\_

The Return to Petition for Writ of Certiorari was due to be served and filed October 21, 2024. However, due to a clerical error, Respondent did not timely submit an extension request. Respondent respectfully requests that the Court accept this motion to file its extension request out of time and moves for a 30-day extension in which to serve and file the Return.

The request for extension is made due to counsel’s heavy caseload, including that counsel has addressed several capital case matters within the last 30 days. Given her caseload at this time, counsel has been unable to complete the Return. Consequently, counsel respectfully request this Court grant an extension until November 25, 2024, to serve and file the Return.

Chief Appellate Defender, Robert M. Dudek, has consented to this request pursuant to the reciprocal consent for extension agreements and out of time filings between Appellate Defense and the South Carolina Attorney General's Office up to and including October 31, 2024.

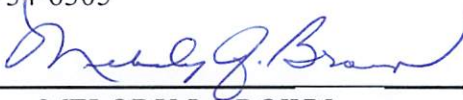
Respectfully submitted,

ALAN WILSON  
Attorney General

DONALD J. ZELENKA  
Deputy Attorney General

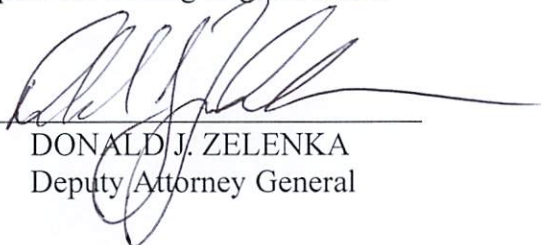
MELODY J. BROWN  
Senior Assistant Deputy Attorney General  
SC Bar No. 14244

Post Office Box 11549  
Columbia, SC 29211-1549  
(803) 734-6305

By:   
\_\_\_\_\_  
MELODY J. BROWN  
SC Bar No. 14244

ATTORNEYS FOR RESPONDENT

I support the finding of good cause.

By:   
\_\_\_\_\_  
DONALD J. ZELENKA  
Deputy Attorney General