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S.C. SUPREME COURT

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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ON WRIT OF CERTIORARI TO LEXINGTON COUNTY  
Court of Common Pleas  
The Honorable Edward W. Miller, PCR Judge

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Appellate Case No. 2024-000232

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BILLY GEISENDORFF, # 369685

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT.

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

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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 **January 26, 2025**. This is Respondent's second request for an extension in which to file the return, which was due to be filed and served on December 27, 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.

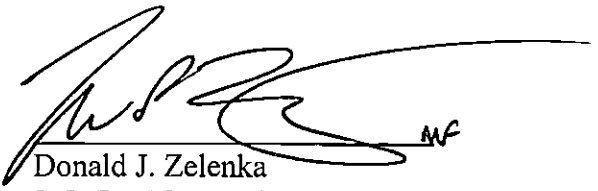
WHEREFORE, undersigned counsel for Respondent respectfully requests a second **thirty-**

day extension until **January 26, 2025**, in which to complete 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

DONALD J. ZELENKA  
Deputy Attorney General

BY:  MF

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January 2, 2025

ATTORNEYS FOR RESPONDENT