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Jan 13 2025

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In The Supreme Court

On Petition for Writ of Certiorari to Richland County
Court of Common Pleas

The Honorable George M. McFaddin, Jr., PCR Judge
The Honorable J. Derham Cole, Circuit Judge

Appellate Case No. 2024-001229

Dexter L. Myers, SCDC #365377,

Petitioner,

v.

State Of South Carolina,

Respondent.

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

Counsel for Respondent respectfully moves for a **fourth** and **final** extension of thirty (30) days in which to serve and file the Return to Petition for Writ of Certiorari in this case. This is a fourth request for an extension. In support of this request, counsel shows:¹:

1. The Return to Petition for a Writ of Certiorari is due to be served and filed with the Court today, January 13, 2025.

¹ In compliance with: In Re: Extensions in Criminal and Post-Conviction Relief Cases, (S.C. Sup. Ct. order dated March 18, 2009) (Davis Adv. Sh. No. 13 at 1).

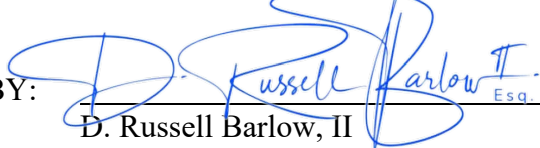
2. Counsel for Respondent respectfully submits that extraordinary circumstances exist that warrant the granting of an additional time extension. Given the number of extensions previously granted and the order in which Counsel attempts to manage his heavy caseload, Counsel hopes that no further extension requests will be required.
3. Counsel had a term of court on October 21–25, 2024, in the Twelfth Judicial Circuit, in which Counsel is preparing orders.
4. Counsel had a term of court on November 4–8, 2024, in the Sixth Judicial Circuit, in which Counsel is preparing orders.
5. Counsel had a term of court on December 9–13, 2024, in the Fourth Judicial Circuit, in which Counsel is preparing orders.
6. Counsel had a term of court on January 6–10, 2025, in the Sixth Judicial Circuit, in which Counsel is preparing orders.
7. Counsel is preparing for a term of court on February 3–7, 2025, in the Twelfth Judicial Circuit.
8. In the last month, Counsel has had multiple PCR filings due with the lower courts in the Fourth, Fifth, Sixth, Seventh, and Twelfth Judicial Circuits.
9. 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.
10. Opposing Counsel has graciously consented to this request.

WHEREFORE, the undersigned Counsel would respectfully request a ten-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

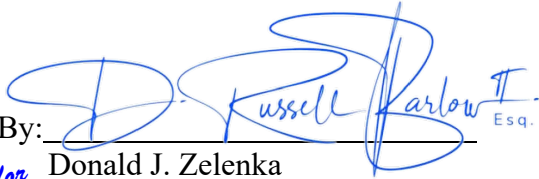
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BY:  Esq.

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ATTORNEYS FOR RESPONDENT

I have reviewed and approved this extension request.

By:  Esq.
for Donald J. Zelenka
Deputy Attorney General

January 13, 2025