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Feb 24 2025

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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On Petition for Writ of Certiorari to Williamsburg County  
Court of Common Pleas  
The Honorable R. Kirk Griffin, PCR Judge  
The Honorable R. Ferrell Cothran, Circuit Judge

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Appellate Case No. 2024-000178

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John A. James, III, SCDC #196633,

Petitioner,

v.

State Of South Carolina,

Respondent.

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

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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:<sup>1</sup>

1. The Return to Petition for a Writ of Certiorari is due to be served and filed with the Court today, February 24, 2025.

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<sup>1</sup> 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 January 13–17, 2025, in the Third Judicial Circuit, in which Counsel is preparing orders.
4. Counsel had a term of court on February 10–14, 2025, in the Sixteenth Judicial Circuit, in which Counsel is preparing orders.
5. Counsel is preparing for a term of court on March 31–April 4, 2025, in the Eighth Judicial Circuit.
6. In the last month, Counsel has had multiple PCR filings due with the lower courts in the Second and Third Judicial Circuits.
7. 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.
8. Opposing Counsel has graciously consented to this request via interagency agreement.

**[SIGNATURE PAGE FOLLOWS]**


WHEREFORE, the undersigned Counsel would respectfully request a thirty-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

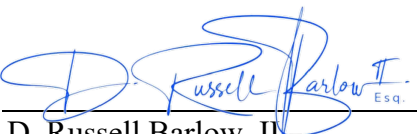
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ATTORNEYS FOR RESPONDENT

I have reviewed and approved this extension request.

By:  Esq.  
D. Russell Barlow, II  
Senior Assistant Deputy Attorney General  
S.C. Bar No. 105228

February 24, 2025