

Mar 28 2025

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM DARLINGTON COUNTY

Honorable Roger E. Henderson, Circuit Court Judge
Honorable George M. McFaddin, Jr., PCR Judge

Appellate Case No. 2024-000550

Angelo Ham, SCDC #315014,

Petitioner,

v.

State Of South Carolina,

Respondent.

**MOTION FOR A FOURTH EXTENSION TO SERVE AND FILE THE
RETURN TO PETITION FOR WRIT OF CERTIORARI AND BRIEF OF
RESPONDENT PURSUANT TO WHITE V. STATE**

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 and the Brief of Respondent Pursuant to White v. State 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 and the Brief of Respondent Pursuant to White v. State was due to be served and filed with the Court on March 28, 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 November 4–8, 2024, in the Sixth Judicial Circuit, in which Counsel is preparing orders.
4. Counsel had a term of court on December 9–13, 2024, in the Fourth Judicial Circuit, in which Counsel is preparing orders.
5. Counsel had a term of court on January 6–10, 2025, in the Sixth Judicial Circuit, in which Counsel is preparing orders.
6. Counsel had a term of court on February 3–7, 2025, in the Twelfth Judicial Circuit, in which Counsel is preparing orders.
7. Counsel assisted in a term of court on March 3–7, 2025, in the Eleventh Judicial Circuit, in which Counsel is preparing orders.
8. Counsel had a term of court on March 10–14, 2025, in the Fourth Judicial Circuit, in which Counsel is preparing orders.
9. Counsel has a term of court on April 7–11, 2025, in the Fifth Judicial Circuit, in which Counsel is preparing for those hearings.
10. 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.
11. 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.
12. Opposing counsel has graciously consented to this request via email.

