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Oct 20 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 Court of Common Pleas  
Appeal from Oconee County

Honorable William H. Seals, Circuit Court Judge  
Honorable George M. McFaddin, Jr., PCR Judge

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Appellate Case No. 2025–000180

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Myron A. Cannon, SCDC #296787,

Petitioner,

v.

State of South Carolina,

Respondent.

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**MOTION FOR A FOURTH EXTENSION 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 five (5) 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 was due to be served and filed with the Court on October 20, 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 her heavy caseload, Counsel hopes that no further extension requests will be required.
3. Counsel had a term of court on August 18–22, 2025, in the Fifth Judicial Circuit, in which Counsel is preparing orders.
4. Counsel had a term of court on August 25–29, 2025, in the Seventh Judicial Circuit, in which Counsel is preparing orders.
5. Counsel had a term of court on September 1–5, 2025, in the Fourth Judicial Circuit, in which Counsel is preparing orders.
6. Counsel had a term of court on September 15–19, 2025, in the Eleventh Judicial Circuit, in which Counsel is preparing orders.
7. Counsel has a term of court on October 27–31, 2025, in the Twelfth Judicial Circuit, in which Counsel is preparing for those hearings.
8. Counsel has a term of court on November 10–14, 2025, in the Fifth Judicial Circuit, in which Counsel is preparing for those hearings.
9. Counsel has a term of court on November 17–21, 2025, in the Seventh 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, Eleventh, 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.

WHEREFORE, the undersigned counsel would respectfully request a five-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

DONALD J. ZELENKA  
Deputy Attorney General

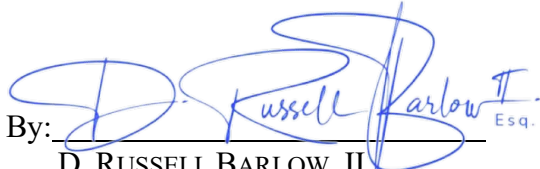
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ATTORNEYS FOR RESPONDENT

I have reviewed and approved this extension request.

By:  \_\_\_\_\_  
D. RUSSELL BARLOW, II  
Senior Assistant Deputy Attorney General

October 20, 2025