

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

Appeal from Greenville County  
Edward W. Miller, Circuit Court Judge

Appellate Case No. 2013-001026

RECEIVED

JAN 23 2014

S.C. Supreme Court

FREDDIE EUGENE OWENS,

Petitioner,

v.

STATE OF SOUTH CAROLINA,

Respondent.

MOTION TO ENLARGE TIME FOR FILING  
RETURN TO PETITION FOR WRIT OF CERTIORARI

The Respondent, above-named, hereby make a motion to this Court to extend the time for filing the Return to the Petition for Writ of Certiorari from January 21, 2014 for thirty days up to and including February 20, 2014.

In support of the request, undersigned counsel respectfully advises the Court that counsel has been unable to complete the Return to Certiorari because counsel for Respondent has been involved in a number of other state and federal matters, that include:

(A) Curtis Bryant v. Warden (Federal Habeas Return) filed in U.S. District Court:

(B) Mikal Mahdi v. State (Capital PCR) Draft of Amended Order Granting Rule 59  
Motion for the Honorable Doyet Early. (in process);

(C) State v. Mathew Fullbright (Murder X 2, Armed Robbery X 2) Initial Brief of  
Respondent. (in process, currently approximately 48 pages) due February 3,  
2014;

(D) State v. Antonio Scott (Murder) Preparation for and Oral Argument before the S.C. Court of Appeals on **January 8, 2014**;

(E) Demetrius Smalls v. Warden (Federal Habeas Return) **filed in U.S. District Court**;

(F) Edmund Goins v. Warden (Federal Habeas Appeal) preparation of brief for 4<sup>th</sup> Circuit Court of Appeals, **in process (due January 27, 2014)**;

(G) Bobby Gibson v. Warden (Federal Habeas Return) **filed in U.S. District Court**;

(H) State v. Antonio Miller (Murder, Armed Robbery, Kidnapping) (Initial Brief of Respondent) **filed in the S.C. Court of Appeals**;

and other matters.

Wherefore Respondents respectfully request an extension of a period of time of thirty (30) days up to and including **February 20, 2014**. This is a 2<sup>nd</sup> extension request.

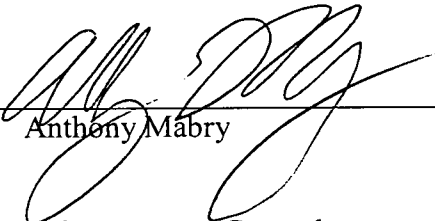
Respectfully submitted,

ALAN WILSON  
Attorney General

DONALD J. ZELENKA  
Senior Assistant Deputy Attorney General

ANTHONY MABRY  
Assistant Attorney General

**ATTORNEYS FOR RESPONDENT**

By:   
Anthony Mabry

Office of the Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29211  
(803) 734-6305

January 21, 2014

**CERTIFICATE OF SERVICE**

I, **Anthony Mabry**, hereby certify that I have served the Motion to Enlarge Time for Filing Return to Petition for Writ of Certiorari in the foregoing action by depositing copies in the United States mail, postage prepaid to the following:

Emily C. Paavola, Esquire  
Death Penalty Resource & Defense Center  
900 Elmwood Avenue, Ste. 101  
Columbia, SC 29201

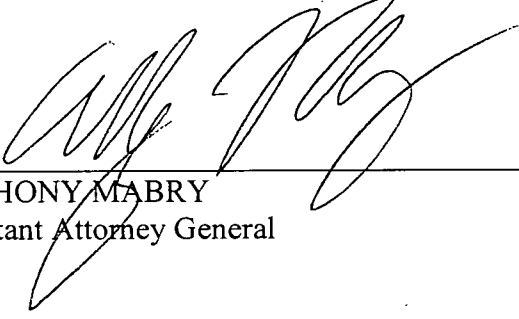
Keir M. Weyble, Esquire  
Cornell Law School  
Myron Taylor Hall  
Ithaca, NY 14853

**RECEIVED**

JAN 23 2014

**S.C. Supreme Court**

This 21<sup>st</sup> day of January, 2014.



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ANTHONY MABRY  
Assistant Attorney General