

IN THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Edward W. Miller, Circuit Court Judge

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Case No. 09-CP-23-0741  
Appellate Case No. 2013-001026

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Freddie Eugene Owens, #5065,

v.

State of South Carolina.

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**RECEIVED**

JUL 07 2014

**S.C. SUPREME COURT**

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**PETITIONER'S MOTION FOR EXTENSION  
OF TIME TO FILE REPLY**

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Petitioner, Freddie Eugene Owens, through undersigned counsel, for the reasons stated below, respectfully requests that this Court grant an extension of time for 30 days to file his Reply to Respondent's Return to Petition for Writ of Certiorari presently due for filing on July 3, 2014. The reasons for this motion are as follows:

1. The Petition for Writ of Certiorari was filed in this matter on November 6, 2013. Respondent requested and received six (6) thirty-day extensions of time before ultimately filing a Return on June 23, 2014. Respondent simultaneously filed a motion to exceed the page limitations, requesting permission to file a Return of up to 125 pages in length. On July 1, 2014, undersigned counsel received this Court's order granting Respondent's motion. Respondent's Return is

unusually long and undersigned counsel requires additional time to adequately review the Return and prepare an appropriate response.

2. Furthermore, undersigned counsel has a number of other case obligations, and reasonably believes that an extension is needed to thoroughly and accurately brief the issues in this case.

THEREFORE, for the reasons stated above, petitioner respectfully submits that an extension of time is warranted for good cause and requests thirty days, thus making the Reply due on August 4, 2014.


Respectfully submitted,

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BY:   
COUNSEL FOR PETITIONER

July 2, 2014

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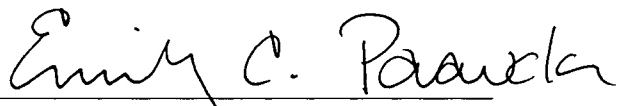
**CERTIFICATE OF SERVICE**

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I, Emily Paavola, hereby certify that I have served upon the attorney for the Respondent one (1) copy of Petitioner's Motion for Extension of Time to File the Reply in the above referenced case by depositing a copy of the same in the United States Mail, first class, postage pre-paid, addressed as follows:

J. Anthony Mabry  
Office of the Attorney General  
P.O. Box 11549  
Columbia, SC 29211

This 2<sup>nd</sup> day of July, 2014, in Columbia, SC.

  
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Emily C. Paavola