

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT
Certiorari to Orangeburg County
L. Casey Manning, Circuit Court Judge

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JAN 16 2015

S.C. Supreme Court

SAMMIE LOUIS STOKES,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2013-000635

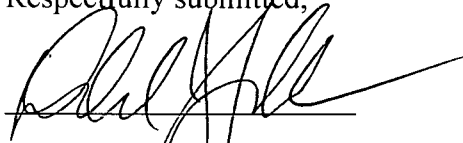
**RESPONDENT'S MOTION TO EXTEND TIME TO FILE
RETURN TO PETITION FOR WRIT OF CERTIORARI**

The Respondent, above-named, hereby make a motion to the Court to extend the time of filing the Return to Petition for Writ of Certiorari until February 17, 2015. The Return to Petition for Writ of Certiorari in the above action is due to be filed January 16, 2015. This motion is made because the Respondent has not been able to respond within the allotted time for the following reasons:

1. Counsel for the undersigned has had a number of other commitments in State and Federal court that have precluded timely completion of the Return.
2. Counsel has contacted the office of opposing counsel, Chief Appellate Defender Robert M. Dudek, and he consents to this request on behalf of his client.

Wherefore Respondents respectfully request an extension of a period of thirty days up to and including February 17, 2015 to complete the Return to Petition for Writ of Certiorari upon a showing of good cause for the request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Donald J. Zelenka', written over a horizontal line.

Donald J. Zelenka

Senior Assistant Deputy Attorney General

S.C. Bar # 5758

Attorney for Respondent

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true copy of the Motion to extend time to file the State's Return to Petition for Writ of Certiorari in the above referenced case has been served upon counsel for Petitioner by depositing one copy of same in the United States Mail, postage prepaid, to each attorney, addressed as follows:

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

Robert M. Dudek, Esq.
Chief Appellate Defender
SCCID/Division of Appellate Defense
PO Box 11589
Columbia, SC 29211

This 16th day of January, 2015


Donald J. Zelenka
Senior Assistant Deputy Attorney General
Attorney for Respondent