

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Appeal from Greenville County
G. Edward Welmaker, Circuit Court Judge

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JAN 20 2015

S.C. Supreme Court

CHARLES CHRISTOPHER WILLIAMS,

Petitioner,

v.

STATE OF SOUTH CAROLINA,

Respondent.

Appellate Case No. 2013-001945

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

The Respondent, above-named, by and through the undersigned attorneys, would respectfully move this Court for a brief ten (10) day extension of time within which to file its Return to the Petition for Writ of Certiorari – up to and including January 30, 2015. Opposing counsel Derek Enderlin has advised he has no objection to this request. This is counsel's seventh (7th) request for extension of time in which to file the return; however, this request is based primarily on the fact that counsel for Respondent, Mr. Zelenka, is absent from the office due to required medical care. In further support of this request, Respondent would respectfully show the Court:

1. Counsel for Respondent has been diligently working on a draft of the Return. Counsel has made completion of the Return a priority in his case load.

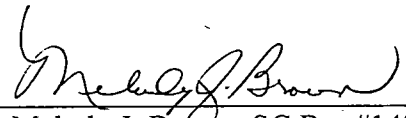
2. Counsel has substantially completed the Return and is currently editing five of the six issues. Counsel will continue working on the brief upon return to the office.
3. Counsel will file as soon as possible within the requested ten (10) days.
4. Counsel would not make this extraordinary request absent the required medical care that necessitates his absence from his office.

WHEREFORE Respondents respectfully request an extension of a period of ten (10) days up to and including Friday, January 30, 2015 to complete this Return to the Petition for a Writ of Certiorari.

Respectfully submitted,

DONALD J. ZELENKA
Senior Assistant Deputy Attorney General

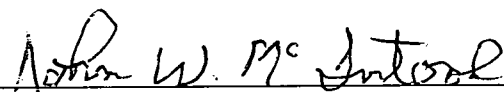
ATTORNEYS FOR RESPONDENT

By: 
Melody J. Brown, SC Bar #14244
for Donald J. Zelenka, Senior
Assistant Deputy Attorney General

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

January 20, 2015.

I concur that extraordinary circumstances have been shown to this request.


John W. McIntosh
Chief Deputy Attorney General

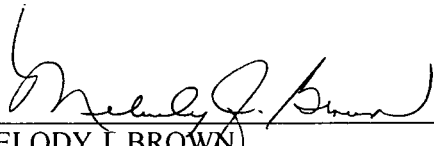
CERTIFICATE OF SERVICE

I, Melody J. Brown, 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 a copy in the United States

Mail to:

Mr. Derek J. Enderlin
Ross and Enderlin, PA.
330 East Coffee Street
Greenville, South Carolina 29601

This 20th day of January, 2015.



MELODY J. BROWN
Senior Assistant Attorney General