

THE STATE OF SOUTH CAROLINA

In The Supreme Court

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

G. Edward Welmaker, Circuit Court Judge  
Case No. 2010-CP-23-9792

Appellate Case No. 2013-001945

**RECEIVED**

FEB 09 2015

**S.C. SUPREME COURT**

Charles Christopher Williams,

Appellant,

v.

The State of South Carolina,

Respondent.

MOTION FOR EXTENSION OF TIME TO FILE REPLY

The undersigned was appointed to represent the petitioner in filing a petition for writ of certiorari. In filing the petition, the undersigned made two requests for thirty (30) day extensions, and one request for a seven (7) day extension and the petition was served on June 4, 2014. Due to case workload and the complexity of this and other pending matters, the State made several requests for extension and filed their Return on January 30, 2015. The undersigned received the return on February 2, 2015 and based on appellate rules it is my calculation the Reply would be due February 13, 2015.

Based on Order 2009-03-18-01, the respondent believes a first extension of up to thirty (30) days may be granted for any stage of the appellate proceeding without a showing of good cause. Therefore, undersigned would request a thirty (30) day first extension to file the Reply in this case, meaning the Reply would be due March 14, 2015, a Saturday, which would therefore

mean the Reply would be due March 16, 2015, the following Monday.

The undersigned would also note, that while the rules do not require a showing of good cause, this case is extremely unusual in that it is a capital case with over 3,500 pages of transcript. Furthermore, what is particularly unusual in this case is the State did not file a brief or a proposed order at the trial level. Therefore, the State's 168 page Return is the first opportunity to see the State's position on many of the issues in the case in any detail. Therefore, undersigned feels he needs considerable time to review the State's Return in order to determine whether there is additional case law or factual references he has yet to consider.

On behalf of petitioner, I so move.

February 5, 2015



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