

STATE OF SOUTH CAROLINA  
In The Supreme Court

---

RECEIVED

APPEAL FROM GEORGETOWN COUNTY  
Court of Common Pleas

MAR - 4 2015

The Honorable George C. James Jr., Circuit Court Judge

---

S.C. Supreme Court

Appellate Case No. 2014-002027

---

Steven L. Hewitt, .....Respondent,

v.

State of South Carolina, ..... Petitioner.

---

**MOTION FOR EXTENSION OF TIME TO SERVE AND FILE THE PETITION FOR  
WRIT OF CERTIORARI AND APPENDIX**

---

Respondent, through its undersigned counsel, would respectfully show unto this Court as follows:

**I.**

The Petition for Writ of Certiorari is due to be filed and served, today, pursuant to three (3) previous extensions granted by the Court.

**II.**

Because of an unusually heavy workload, I am unable to complete this Petition on time. Since the last extension granted by this Court, I have represented the State at a term of post-conviction relief hearings in the Fifteenth Circuit the week of February 2, 2015. I have also appeared on behalf of the State at post-conviction relief hearings in the Tenth Circuit on February 10, 2015, and in the Eighth Circuit on February 19, 2015. I have prepared proposed orders for circuit court cases heard the week of January 19, 2015, in the Fourth Circuit, as well as proposed orders from the February 2, 2015, Fifteenth Circuit term.

I have also prepared and filed with this Court a Return to Petition for Writ of Certiorari in the cases of Michael Lackey v. State and Tony Moore v. State.

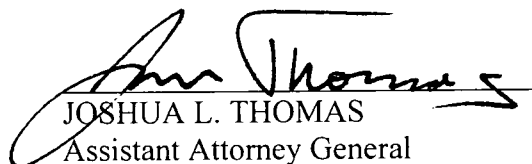
**III.**

Pursuant to the Court's March 18, 2009, order RE: Extension Requests in Criminal Direct Appeals and Post-Conviction Relief Certiorari Proceedings, Respondent moves for a **fourth and final extension** in the above referenced matter. This request is made in good faith, and not for the purposes of delay. The undersigned will give this matter the highest priority, and thirty (30) days is more than sufficient time for completion of the petition and appendix. This is the first time undersigned counsel has requested a fourth extension on any appellate case. Furthermore, this appeal involves four (4) distinct issues, and the undersigned needs additional time to properly research these issues. Opposing counsel consents to this extension, as evidenced by her signature below.

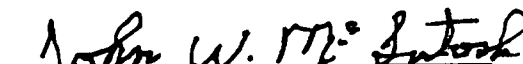
**IV.**

WHEREFORE, for the above reasons, the Respondent respectfully requests that this Court grant a fourth and final extension of time in which to file the Petition for Writ of Certiorari and Appendix.

Respectfully submitted,

  
JOSHUA L. THOMAS

Assistant Attorney General  
S.C. Bar No. 100777

  
John W. McIntosh  
Chief Deputy Attorney General

ATTORNEYS FOR RESPONDENT  
Office of the Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29211  
Telephone: (803) 734-3737

I consent:

Susan B. Hackett  
Susan B. Hackett, Esquire  
Attorney for Respondent

4th floor

March 3, 2015

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

---

Appeal From Georgetown County  
Honorable George C. James, Jr., Circuit Court Judge

---

STEVEN L. HEWITT

RESPONDENT,

vs.

THE STATE,

PETITIONER.

---

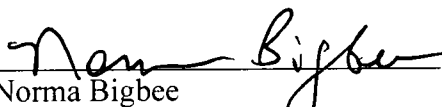
**PROOF OF SERVICE**

---

I, Norma Bigbee, certify that I have served the State's Motion for Extension of Time To Serve And File The Petition for Writ of Certiorari and Appendix on respondent's attorney by depositing a copy of the same in the United States mail, postage prepaid, addressed to Susan B. Hackett, Esquire, Appellate Defender, SC Commission on Indigent Defense, Division of Appellate Defense, P.O. Box 11589, Columbia, SC 29211.

I further certify that all parties required by Rule to be served have been served.

This 4<sup>th</sup> day of March, 2015.

  
Norma Bigbee  
Administrative Assistant  
Office of Attorney General  
Post Office Box 11549  
Columbia, SC 29211  
(803) 734-3727



ALAN WILSON  
ATTORNEY GENERAL

March 4, 2015

RECEIVED

MAR - 4 2015

**VIA HAND DELIVERY**

The Honorable Daniel E. Shearouse  
Clerk, South Carolina Supreme Court  
Post Office Box 11330  
Columbia, SC 29211

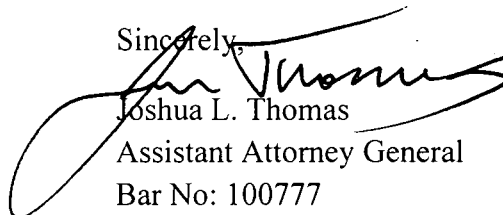
**S.C. Supreme Court**

RE: **Steven L. Hewitt v. State of South Carolina**  
**Appellate Case No: 2014-002027**

Dear Mr. Shearouse

Enclosed please find the Original Motion For Extension of Time To Serve And File The Petition For Writ of Certiorari and Appendix in the above case.

Sincerely,



Joshua L. Thomas  
Assistant Attorney General  
Bar No: 100777

JLT/nb

Enclosures

cc: Susan B. Hackett, Esquire  
Trisha Allen