

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

MAR 12 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 the Reply was due February 13, 2015.

Based on Order 2009-03-18-01, the appellant was granted a first extension of thirty (30) days to file the reply, being due March 16, 2015. Appellant now requests an additional thirty (30) day extension to file a reply in this case. 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. Furthermore, the undersigned was recently appointed City Attorney for the City of Westminster and he has spent considerable more time than he originally envisioned on the city's legal issues. He is also in the process of opening an office in Westminster. This case is the only capital case the undersigned has and he hopes to complete any work on a potential reply in the next thirty days. The undersigned believes based on these reasons there is good cause to allow a second extension.

On behalf of petitioner, I so move.

March 10, 2015



Derek J. Enderlin
ROSS AND ENDERLIN, PA
330 East Coffee Street
Greenville, SC 29609
864-647-7205
derek@rossenderlin.com
Attorney for Appellant