


that the Amended Explanation was not mailed.

4. Over the next several weeks counsel did not review Mr. Chestnut's case and therefore did not follow up with the court.
5. Counsel was reminded of this obligation on September 4, 2015.
6. Counsel sincerely apologizes to the Clerk's Office, the Chief Justice, and the Court as a whole for this delay.
7. Counsel maintains that his failure to comply with the Chief Justice's July 31st order not willful disobedience, but rather a serious mistake caused by Counsel being distracted by other obligations. Counsel will try to be more attentive to requests from the Clerk's Office and the Court in the future.
8. Counsel asks that this Court not prejudice Petitioner due to his mistake.
9. Counsel has consulted with Counsel for the State who does not oppose this request and has authorized Counsel to indicate such. *See Exhibit A.*
10. Counsel is making this request in good faith and not for the purposes of delay.

Based on the foregoing, Counsel would respectfully request to be allowed to file the Amended Rule 243 Explanation in the above referenced case out of time.

Respectfully Submitted,



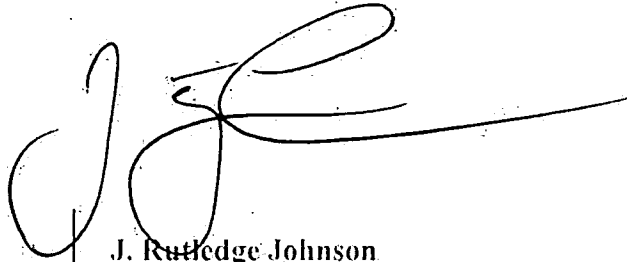
Tristan M. Shaffer
4701 Oleander Drive
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(843) 916-9300
Tristan@gotaxelrod.com
Attorney for Petitioner

September 8, 2015

Exhibit A

Tristan,

On behalf of Josh Thomas, Esquire, we consent to your request.



J. Rutledge Johnson

Assistant Deputy

Attorney General



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SUPREME COURT OF SOUTH CAROLINA

APPEAL FROM HORRY COUNTY
In The Court of Common Pleas

Honorable G. Thomas Cooper, Jr.,
Circuit Court Judge

Case No.: 2012-CP-26-1814
Appellate Case No. 2015-000891

Raymond E. Chestnut,

Petitioner,


v.

State of South Carolina,

Respondent.

CERTIFICATE OF SERVICE

I, certify that on this date, I served the Second Petition to File the Amended Rule 243 Explanation Out of Time upon Respondent by delivering this document to the Attorney General's Office.



Tristan M. Shaffer
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Attorney for Petitioner

September 15, 2015

RECEIVED

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S.C. Supreme Court