

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM COUNTY OF GREENVILLE
Court of Common Pleas

RECEIVED

The Honorable D. Garrison Hill, Circuit Court Judge **MAR 24 2016**

Appellate Case No.: 2015-001087
Lower Court Case No. 2011-CP-23-3652

S.C. SUPREME COURT

LaChrisha Shentayle Miller,.....Respondent,

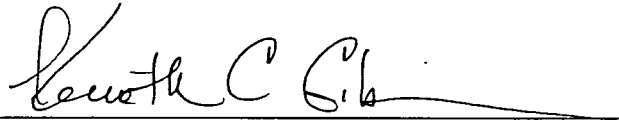
vs.

The State of South Carolina,Petitioner.

**MOTION FOR EXTENSION OF TIME TO FILE AND SERVE
RESPONDENT/PETITIONER'S PETITION FOR WRIT OF CERTIORARI AND
RETURN TO PETITIONER/RESPONDENT'S PETITION FOR WRIT OF
CERTIORARI**

Respondent/Petitioner's Petition For Writ Of Certiorari and the Return To
Petitioner/Respondent's Petition For Writ Of Certiorari are due to be served and filed
today. Counsel would respectfully request a 30-day extension in which to serve and file
these pleadings. This request is not intended for the purpose of delay. Rather, this request
is necessary due to the fact that illness in Counsel's family and the other demands of
Counsel's practice have prohibited him from being able to comply with the current
deadline. Counsel anticipates that this is the last extension request that he will need.
Counsel for Petitioner-Respondent has indicated that she has no objection to this request.

Date: March 21, 2016

A handwritten signature in black ink, reading "Kenneth C. Gibson". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Kenneth Gibson
THE LAW OFFICE OF KENNETH GIBSON
607 Pendleton Street, Ste. 226
Post Office Box 5536
Greenville, SC 29606
(864) 241-6699

Attorney for Respondent

Karen Ratigan
Office of the Attorney General
Post Office Box 11549
Columbia, SC 29211
(803) 734-3970
Attorney for Petitioner

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vs.

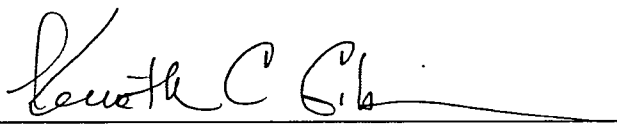
The State of South Carolina,Petitioner.

PROOF OF SERVICE

The undersigned hereby certifies that he is a person of such age and discretion as to be competent to serve process and that on this day, he served copies of the attached **MOTION FOR EXTENSION OF TIME TO FILE AND SERVE RESPONDENT/PETITIONER'S PETITION FOR WRIT OF CERTIORARI AND RETURN TO PETITIONER/RESPONDENT'S PETITION FOR WRIT OF CERTIORARI** upon The State of South Carolina by mailing a true and correct copy to:

Karen Ratigan
Office of the Attorney General
Post Office Box 11549
Columbia, SC 29211.

Date: March 21, 2016



Kenneth C. Gibson, Esq.

Kenneth C. Gibson
Attorney at Law

607 Pendleton Street, Suite 226 (29601)
Post Office Box 5536 • Greenville, SC 29606
Phone: (864) 241-6699 • Facsimile: (864) 241-6211

March 21, 2016

The Honorable Daniel E. Shearouse
The Supreme Court of South Carolina
P.O. Box 11330
Columbia, SC 29211

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MAR 24 2016

S.C. SUPREME COURT

RE: LaChrisha S. Miller v. State of South Carolina
Appellat Case No.: 2015-001087
Lower Case No.: 2011-CP-23-3652

Dear Mr. Shearouse:

Please find enclosed for filing my **Motion For Extension Of Time To File And Serve Respondent/Petitioner's Petition For Writ Of Certiorari** and **Return To Petitioner/Respondent's Petition For Writ Of Certiorari**. This is Counsel's third request for an extension in this matter. Counsel does not anticipate that he will need another one. Ms. Ratigan, counsel for the State, has indicated that she has no objection to this extension.

Should you have any questions please contact me at your earliest convenience.

Sincerely,



Kenneth Gibson

Enclosures

cc: Karen Ratigan, Office of the Attorney General

Kenneth C. Gibson

Attorney at Law

Post Office Box 5536 • Greenville, SC 29606



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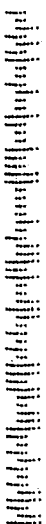
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The Honorable Daniel E. Shearouse
The Supreme Court of South Carolina
P.O. Box 11330
Columbia, SC 29211

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