

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas
The Honorable Michael G. Nettles, Circuit Court Judge

S.C. Supreme Court

Case No. 2007-CP-22-476

ROBERT TROY TAYLOR,

PETITIONER,

(3)

v.

STATE OF SOUTH CAROLINA,

RESPONDENT.

**MOTION FOR FIFTEEN (15) DAY EXTENSION OF TIME WITHIN WHICH
TO FILE THE BRIEF OF RESPONDENT**

COMES NOW the Respondent, by and through undersigned counsel, making its motion for a **fifteen-day** extension of time, would show unto this Court:

I.

The Brief of Respondent in the above-captioned matter is due to be served and filed on May 7, 2012. Two previous extensions have been granted. I have been working on this Brief for the past five consecutive work days and have thus far completed thirty-two pages of the Brief. However, this case involves the issue of the retroactivity of Padilla v. Kentucky, 130 S. Ct. 1473 (2010), and the legal research has been very time-consuming. Consequently, I have not been able to complete the Brief on time. Considering my workload and other deadlines, I expect to be

able to complete this Brief within fifteen days. Therefore, I am respectfully requesting a fifteen-day extension of time in which to submit this Brief. Opposing counsel, Jeremy A. Thompson, consents to this extension request as indicated by his signature below.

II.

WHEREFORE, the State hereby respectfully requests a fifteen-day extension of time in which to file its Brief of Respondent.

Respectfully submitted,

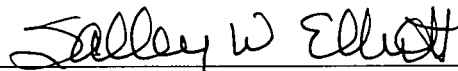
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ATTORNEYS FOR RESPONDENT

May 7, 2012

I CONSENT:


Jeremy A. Thompson, Counsel for Petitioner

STATE OF SOUTH CAROLINA
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v.

STATE OF SOUTH CAROLINA,

RESPONDENT.

PROOF OF SERVICE

The undersigned attorney hereby certifies that the **Motion for Fifteen-Day Extension of Time** in the above-referenced case has been served upon **Jeremy A. Thompson**, Post Office Box 12891, Columbia, South Carolina 29211, this 7th day of **May, 2012**.


CHRISTINA J. CATOE
Assistant Attorney General

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