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OCT 25 2016

S.C. SUPREME COURT


STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM EDGEFIELD COUNTY
Court of General Sessions
R. Knox McMahon, Circuit Court Judge
Memorandum Opinion No. 2016-MO-029 – Filed October 12, 2016

On Certiorari to the Court of Appeals

The State, Respondent,
v.
Julio Angelo Hunsberger, Petitioner.
Appellate Case No. 2015-000085

MOTION TO EXTEND TIME FOR FILING PETITION FOR REHEARING

The Respondent South Carolina, through the undersigned counsel, hereby requests an extension of time to file a petition for rehearing before this Court for a period of fourteen days. The Petition for Rehearing from the October 12, 2016 opinion is due on October 27, 2016. Respondent requests until Thursday November 10, 2016 to file the petition. Petitioner's counsel Katherine H. Hudgins advised counsel that she has no objection to this request.

The reasons for the extension is based upon the extraordinary reason that primary counsel Melody Brown's mother unexpectedly died on Monday October 24, 2016. Senior Assistant Attorney General has been out of the office during a part of the prior week and this week caring for her mother. It is unclear when she will return to the office. Below-signed counsel will be

traveling out of state in Atlanta Georgia for a deposition in a capital post-conviction matter the remainder of the week and would be unable to timely complete the petition,

WHEREFORE, Respondent requests and extension of time up to and including November 10, 2016 to file and serve a petition for rehearing in this matter.

Respectfully submitted,

ALAN WILSON
Attorney General

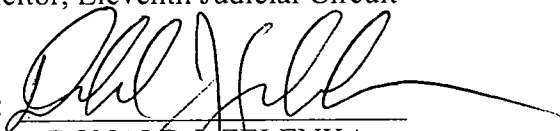
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BY:



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October 25, 2016.
Columbia, South Carolina.

ATTORNEYS FOR RESPONDENT

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PROOF OF SERVICE

I, Donald J. Zelenka, certify that I have served the MOTION TO EXTEND TIME FOR FILING PETITION FOR REHEARING on Petitioner by depositing a copy of same in the United States mail, postage prepaid, addressed to his attorney of record:

Katherine H. Hudgins, Appellate Defender
South Carolina Commission on Indigent Defense
Division of Appellate Defense
P.O. Box 11589
Columbia, South Carolina 29211-1589

This 25th day of October, 2016.


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