



ALAN WILSON
ATTORNEY GENERAL

November 10, 2016

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S.C. SUPREME COURT

The Honorable Daniel E. Shearouse
Clerk, Supreme Court of South Carolina
Post Office Box 11330
Columbia, South Carolina 29211

RE: Robert Cannon v. State
Appellate Case No. 2015-002143

Dear Mr. Shearouse:

The Return to Petition for Writ of Certiorari in the aforementioned matter is due to be served and filed today. I would respectfully request a fourth and final 30-day extension in which to serve and file the Return. This request is not intended for the purpose of delay; rather, this request is necessitated by my workload.

I took over this appeal in September which is five volumes and 2,106 pages long. As the Supervisor of the Post-Conviction Relief Section I manage ten (10) attorneys and eight (8) legal assistants. In addition, during the last thirty days I have researched, prepared for, traveled to, and handled my own PCR cases held in Beaufort, Greenville, Oconee, and Anderson. This week I am handling the PCR court term for the Eleventh circuit. I am seventy-five percent complete with my draft of the Return to Petition for Writ of Certiorari and expect to be done very soon.

The State would respectfully request that the Court grant this final request for an extension. Opposing counsel indicates consent by her signature below. We would also ask that any deadlines be held in abeyance pending the Court's decision on this request.

Sincerely,

Johanna C. Valenzuela
Senior Assistant Deputy Attorney General
S.C. Bar No. 79834

JCV/fvh

cc: Susan B. Hackett, Esquire

I CONSENT:

Susan B. Hackett, Esquire
Attorney for Petitioner

John W. McIntosh
Chief Deputy Attorney General