

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Appeal from Richland County  
G. Thomas Cooper, Circuit Court Judge

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NORMAN MITCHELL,

V.

STATE OF SOUTH CAROLINA,

PETITIONER

APPELLATE CASE NO. 2016-000241

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MOTION FOR AN EXTENSION OF TIME IN WHICH TO FILE  
THE RESPONDENT'S RETURN TO THE PETITION FOR WRIT OF CERTIORARI

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Counsel for Norman Mitchell respectfully requests an extension of thirty (30) days in which to file the Respondent's Return to the Petition for Writ of Certiorari in this case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. This is a second request for an extension. In support of this request, counsel shows:

1. The Respondent's Return to the Petition for Writ of Certiorari is due to be served and filed with the Court today.
2. Counsel for Norman Mitchell respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions previously granted and the order in which counsel attempts to manage her caseload, counsel hopes that no further extension requests will be required.

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S.C. SUPREME COURT  
RESPONDENT,

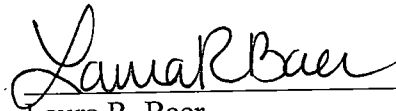
3. Counsel filed the Anders brief of appellant and record on appeal in the case of State v. Calvin Terrell Williams with the Court of Appeals on January 18, 2017. Counsel filed the initial reply brief of appellant in the case of State v. Dean Distasio with the Court of Appeals on January 12, 2017. Counsel filed the initial brief of appellant in the case of State v. Preston Mozeak with the Court of Appeals on January 11, 2017. Counsel filed the initial brief of appellant in the case of State v. Richard A. Capell with the Court of Appeals on January 9, 2017. Counsel filed the initial brief of appellant in the case of State v. John Calvin Sledge with the Court of Appeals on January 9, 2017. Counsel filed the Johnson petition for writ of certiorari in the case of Leonard B. Goodwin v. State with this Court on January 3, 2017. Counsel filed the initial brief of appellant in the case of State v. Antwan Adams with the Court of Appeals on December 21, 2016. Counsel filed the petition for writ of certiorari in the case of James William McKinney, Jr. v. State with the Court of Appeals on December 16, 2016. Counsel filed the petition for writ of certiorari in the case of Chad Hollingsworth v. State with this Court on December 7, 2016. Counsel filed the Brief of Respondent in the case of Letron Davis v. State with this Court on December 5, 2016.

4. Counsel makes this request in good faith and not for purpose of delay.
5. Counsel for the Attorney General's office has been informed of this request.

WHEREFORE, the undersigned counsel would respectfully request a thirty (30) day extension, in which to file the Respondent's Return to the Petition for Writ of Certiorari in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the Return be held in abeyance pending a ruling on this motion.

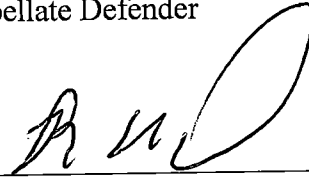
[signatures on next page]

Respectfully submitted,

A handwritten signature in cursive script that reads "Laura R. Baer".

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Laura R. Baer  
Appellate Defender

A handwritten signature in cursive script that reads "R M Dudek".

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Robert M. Dudek  
Chief Appellate Defender

This 19<sup>th</sup> day of January, 2017.

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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NORMAN MITCHELL,

RESPONDENT,

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STATE OF SOUTH CAROLINA,

PETITIONER

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CERTIFICATE OF SERVICE

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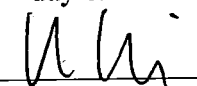
I certify that a copy of the Motion for an Extension of Time in which to file the Respondent's Return to the Petition for Writ of Certiorari in the above referenced case has been served upon J. Clayton Mitchell, Esquire, at the Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 19th day of January, 2017.



Laura R. Baer  
Appellate Defender

ATTORNEY FOR RESPONDENT

SUBSCRIBED AND SWORN TO before me  
this 19<sup>th</sup> day of January, 2017.

 (L.S.)  
Notary Public for South Carolina

My Commission Expires: May 12, 2025.