

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Appeal from Greenville County  
The Honorable Perry H. Gravely, Circuit Court Judge

Appellate Case No. 2016-000283

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FEB 21 2017

S.C. SUPREME COURT

FREDERICK R. CHAPPELL,

Petitioner,

v.

THE STATE,

Respondent.

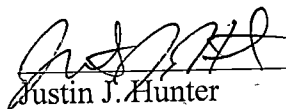
**MOTION FOR FOURTH EXTENSION TO FILE  
RETURN TO PETITION FOR WRIT OF CERTIORARI**

Respondent, the State, moves this Court for an additional thirty (30) day extension of time in which to file the Return to Petition for Writ of Certiorari up to and including March 23, 2017. This is Respondent's fourth request for an extension of time in which to file the petition. In support of the request, undersigned counsel would respectfully show the Court:

1. The Return to Petition for Writ of Certiorari is due to be filed with the Court today. The Court has granted counsel three previous extensions.
2. The Undersigned counsel for Respondent was recently assigned this case due to the departure of an Assistant Attorney General.
3. This is the fourth request for an extension of time in which to file a response.
4. Counsel for the Petitioner consents to this request shown by signature below.

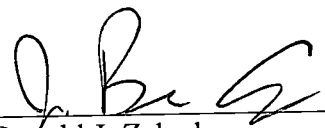
THEREFORE, undersigned counsel for Respondent respectfully requests a **fourth and final thirty (30) day extension** until **March 23, 2017**, in which to complete and file the Return to Petition for Writ of Certiorari in this case based upon the above exigent circumstances.

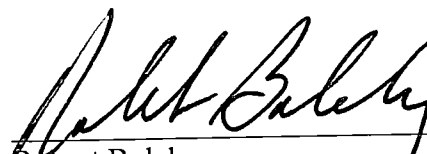
Respectfully submitted,



Justin J. Hunter  
Assistant Attorney General  
S.C. Bar # 101254  
Office of the Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29211  
(803) 734-3737  
Attorney for Respondent


**We concur that extraordinary circumstances  
have been shown**

for   
Donald J. Zelenka  
Deputy Attorney General

  
Robert Bolchoz  
Chief Deputy Attorney General

This 21<sup>st</sup> day of February, 2017

**I consent:**

  
Wanda H. Carter  
Deputy Chief Appellate Defender

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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STATE OF SOUTH CAROLINA,

Respondent,

v.

FREDERICK R. CHAPPELL,

Petitioner.

Appellate Case No. 2015-000731

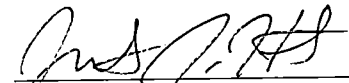
**CERTIFICATE OF SERVICE**

I, Justin J. Hunter, hereby certify that I have served the Motion for Fourth Extension to file the Return to Petition for Writ of Certiorari, on Petitioner by depositing a copy of same in the United States Mail, postage prepaid addressed to:

**Wanda H. Carter, Esquire  
S.C. Commission on Indigent Defense  
Division of Appellate Defense  
Post Office Box 11589  
Columbia, South Carolina 29211**

I further certify that all parties required by Rule to be served have been served.

This 21<sup>st</sup> day of February, 2017



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JUSTIN J. HUNTER  
Assistant Attorney General  
S.C. Bar # 101254

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Post Office Box 11549  
Columbia, South Carolina 29211  
(803) 734-3737

ATTORNEY FOR RESPONDENT