



February 28, 2017

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

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S.C. SUPREME COURT

VIA FAX AND US MAIL

RE: Billy Shane Miller #259358 vs. State of South Carolina
Appellate Case No.: 2016-001990
Lower Court Case No.: 2013-CP-42-3190

Dear Mr. Shearouse:

The Respondent's Return in the above matter is due to be served and filed today. I would respectfully request a thirty (30) day extension in which to serve and file the Return. Therefore, Counsel for Respondent makes this request without consent of opposing Counsel. Counsel for Respondent respectfully requests that this Court hold the deadline in abeyance until this motion is ruled upon. Counsel for Respondent makes this request out of necessity due to a heavy circuit court and appellate court workload and not for the purpose of delay.

With kind regards, I am

Sincerely yours,



Andrew J. Johnston

cc: Alicia A. Olive, Assistant Attorney General

Andrew J. Johnston, Attorney-at-Law

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