

THE STATE OF SOUTH CAROLINA
In the Supreme Court

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MAY 24 2017

APPEAL FROM CHARLESTON COUNTY
The Honorable R. Markley Dennis, Jr., Trial Judge
The Honorable John C. Hayes, Post-Conviction Relief Judge
SOUTH CAROLINA SUPREME COURT

Appellate Case No: 2016-002309

THERRON RICHARDSON,

RESPONDENT,

v.

STATE OF SOUTH CAROLINA,

PETITIONER.

**MOTION FOR FOURTH EXTENSION OF TIME WITHIN WHICH
TO SERVE AND FILE PETITION FOR WRIT OF CERTIORARI
AND APPENDIX**

Petitioner (“the State”), through its undersigned counsel, would respectfully show unto the Court as follows:

I.

The Petition for Writ of Certiorari and Appendix are due to be served and filed on May 24, 2017.

II.

Pursuant to RE: Extension Requests in Criminal Direct Appeals and Post-Conviction Relief Certiorari Proceedings: Order of the South Carolina Supreme Court dated March 18, 2009, the State moves for a **fourth** extension in the above-referenced post-conviction relief appeal and asks for an additional thirty days to complete the petition in this case. Initially, this case was transferred to undersigned counsel less than a week ago after the former counsel of

record left our agency; undersigned counsel of record needs additional time to review all relevant materials before filing the State's petition. Additionally, this week, undersigned counsel is appearing for post-conviction relief evidentiary hearings in Horry County for the Fifteenth Judicial Circuit. Furthermore, undersigned is still in the process of transitioning from an assistant attorney general in the Criminal Appeals Unit to the senior assistant deputy attorney general in the Post-Conviction Relief Unit. Furthermore, the undersigned has recently submitted an Initial Brief of Respondent in State v. Nathaniel Wright, an Initial Brief of Respondent in State v. James Archie Crews, and an Initial Brief of Appellant in State v. Terry Williams. This extension request is made due to significant workload and is not intended for any delay.

III.

This extension request is not intended for purposes of delay, but rather to ensure that the Petition is properly researched and prepared. The Petition in the above case has required significant research because the case involves significant issues on appeal. The undersigned is currently working on the Petition in this case and hopes to have it completed in a timely manner. I would therefore request an extension of time within which to serve and file the Petition.

WHEREFORE, Respondent prays the Court extend the deadline for the service and filing of the Petition for Writ of Certiorari and Appendix in this case for thirty days from the date such relief is granted; hold the matter in abeyance pending a ruling on Respondent's motion; and grant such other and further relief as the Court may deem just and proper.

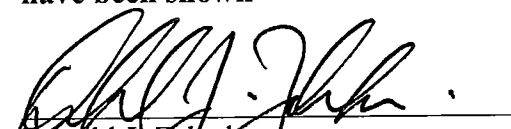
Respectfully submitted,




Megan Harrigan Jameson
Senior Assistant Deputy Attorney General
S.C. Bar No. 100108

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**



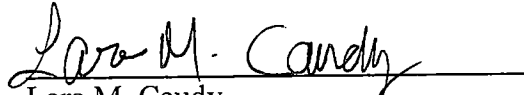
Donald J. Zejenka
Deputy Attorney General



Robert Bolchoz
Chief Deputy Attorney General

This 24th day of May, 2017

I consent:



Lara M. Caudy
Appellate Defender

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM CHARLESTON COUNTY
The Honorable R. Markley Dennis, Jr., Trial Judge
The Honorable John C. Hayes, Post-Conviction Relief Judge

Appellate Case No: 2016-000885

THERRON RICHARDSON,

RESPONDENT,

v.

STATE OF SOUTH CAROLINA,

PETITIONER.

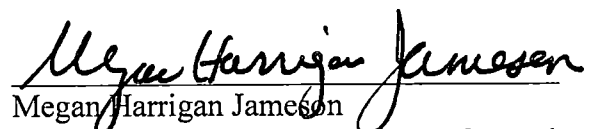
CERTIFICATE OF SERVICE

I, Megan Harrigan Jameson, hereby certify that I have served the Motion for Fourth Extension to file the Petition for Writ of Certiorari and Appendix, on Petitioner by depositing a copy of same in the United States Mail, postage prepaid addressed to:

**Lara M. Caudy, Esquire
SC Commission of Indigent Defense
Post Office Box 11589
Columbia, SC 29201**

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

This 24th day of May, 2017


Megan Harrigan Jameson
Senior Assistant Deputy Attorney General
S.C. Bar # 100108
Office of the Attorney General
Post Office Box 11549
Columbia, South Carolina 29211
(803) 734-3737

ATTORNEY FOR RESPONDENT