

IN THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

G. Thomas Cooper, Jr., Circuit Court Judge

Case No. 2016-001067

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JUN 05 2017

S.C. SUPREME COURT

EUGENE D. PATTERSON,

Petitioner,

v.

STATE OF SOUTH CAROLINA,

Respondent.

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

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

I.

The Return to Petition for Writ of Certiorari are due to be served and filed on June 5, 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. The undersigned has been preparing for and conducting numerous hearings in General Sessions court. This extension request

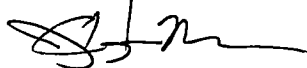
is made due to significant workload and is not intended for any delay.

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.

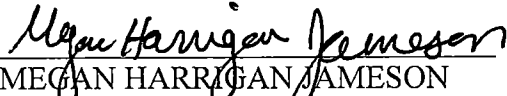
WHEREFORE, Respondent prays the Court extend the deadline for the service and filing of the Petition for Writ of Certiorari in this case for thirty days from the date such relief is granted; hold the matter in abeyance pending a ruling on Respondent's motion; and grant such other and further relief as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

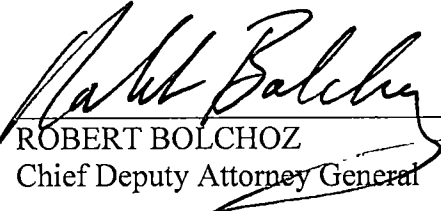
Respectfully submitted,



J. Clayton Mitchell, III
Assistant Attorney General
S.C. Bar # 101443
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.**


MEGAN HARRIGAN JAMESON
Senior Assistant Deputy Attorney General

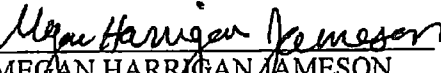

ROBERT BOLCHOZ
Chief Deputy Attorney General


This 5th day of June, 2017

I consent:

Elizabeth A. Franklin-Best
Private Counsel


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


MEGAN HARRIGAN JAMESON
Senior Assistant Deputy Attorney General


ROBERT BOLCHOZ
Chief Deputy Attorney General

This 5th day of June, 2017

I consent:


Elizabeth A. Franklin-Best
Private Counsel

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CERTIFICATE OF SERVICE

I, J. Clayton Mitchell, III, 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:

**Elizabeth A. Franklin-Best, Esquire
Blume Norris & Franklin-Best, LLC
900 Elmwood Avenue, Suite 200
Columbia, SC 29201**

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

This 5th day of June, 2017



J. CLAYTON MITCHELL, III
Assistant Attorney General
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Attorney for Respondent