

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

---

Appeal from Florence County  
The Honorable Thomas A. Russo, Trial Judge  
The Honorable D. Craig Brown, Post-Conviction Relief Judge

Appellate Case No. 2015-002033

---

**RECEIVED**

JUN 05 2017

S.C. SUPREME COURT

GREGORY DANIELS,

Petitioner,

v.

STATE OF SOUTH CAROLINA,

Respondent.

---

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

---

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

**I.**

The 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. Initially, the undersigned has recently submitted a Motion to Consent to Relief Requested in State v. Shaquan Thompson, a

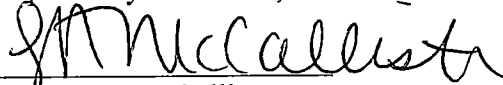
Motion to Supplement Appendix in State v. James Tinsley, and is submitting a Final Brief of Respondent in State v. Onrae Williams today. Additionally, the undersigned has been preparing for post-conviction relief hearings in the Tenth Circuit, which begin the week of June 26, 2017. This extension request 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.

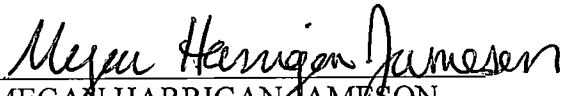
**WHEREFORE**, Respondent prays the Court extend the deadline for the service and filing of the Petition for Writ of Certiorari in this case for thirty days from the date such relief is granted; hold the matter in abeyance pending a ruling on Respondent's motion; and grant such other and further relief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

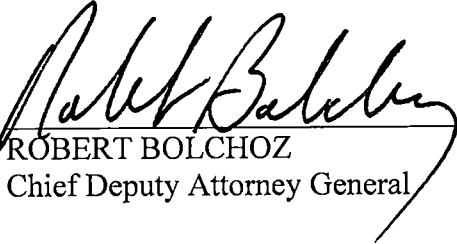
Respectfully submitted,



Lindsey A. McCallister  
Assistant Attorney General  
S.C. Bar # 79054  
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

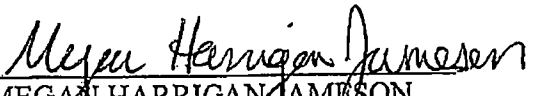
  
\_\_\_\_\_  
ROBERT BOLCHOZ  
Chief Deputy Attorney General

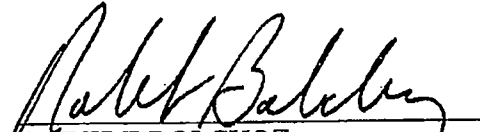
This 5<sup>th</sup> day of June, 2017

**I consent:**

\_\_\_\_\_  
Tricia A. Blanchette  
Private Counsel

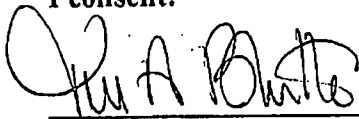
**We concur that extraordinary circumstances  
have been shown.**

  
MEGAN HARRIGAN JAMESON  
Senior Assistant Deputy Attorney General

  
ROBERT BOLCHOZ  
Chief Deputy Attorney General

This 5<sup>th</sup> day of June, 2017

**I consent:**

  
Tricia A. Blanchette  
Private Counsel

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

Appeal from Florence County  
The Honorable Thomas A. Russo, Trial Judge  
The Honorable D. Craig Brown, Circuit Court Judge

Appellate Case No. 2015-002033

GREGORY DANIELS,

Petitioner,

v.

STATE OF SOUTH CAROLINA,

Respondent.

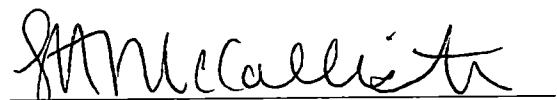
**CERTIFICATE OF SERVICE**

I, Lindsey A. McCallister, 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:

**Tricia A. Blanchette, Esquire**  
**Law Office of Tricia A. Blanchette, LLC**  
**P.O. Box 2147**  
**Leesville, SC 29070**

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

This 5<sup>th</sup> day of June, 2017



LINDSEY A. MCCALLISTER  
Assistant Attorney General  
S.C. Bar # 79054  
Office of the Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29211  
(803) 734-3737

ATTORNEY FOR RESPONDENT