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S.C. Supreme Court

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Appeal from Williamsburg County  
Honorable George C. James, Circuit Court Judge  
Appellate Case Tracking No. 2012-208606

The State,

Respondent,

vs.

Robert Troy Taylor,

Petitioner.

**MOTION FOR SECOND EXTENSION WITHIN WHICH  
TO SERVE AND FILE RETURN  
TO PETITION FOR WRIT OF CERTIORARI**

Respondent, through its undersigned counsel, would respectfully show unto this Court as follows:

I.

The Return to the Petition for Writ of Certiorari is due to be served and filed on November 30, 2012.

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 Respondent moves for a second extension in the above referenced appeal. Due to work required in other cases pending before this Court and the South Carolina Supreme Court, I am unable to complete this Brief on time. The undersigned has completed briefs in State v. Barton, State v. Dumas, State v. D. Rogers,

State v. Henkel, State v. Horry, State v. Carter, State v. Rhoad, State v. B. Rogers, State v. Collington, State v. Tilmon, and State v. Rod. Carter. The undersigned has completed a Petition for Writ of Certiorari in State v. Hawes, State v. Miller, and State v. Kinloch, as well as a Return to the Petition for Writ of Certiorari in State v. Epting, State v. Cameron, State v. Leggette, and State v. Harrison. The undersigned has completed a Brief of Respondent in In the Matter of the Care and Treatment of Simmons and State v. Hercheck. Further, the undersigned has participated in oral argument at the Court of Appeals in State v. Pradubsri, State v. Bonner, State v. Donahue, and State v. Samuel, and in the Supreme Court in State v. Kromah, State v. Sanders, State v. Harrison, and State v. Baker.

### III.

This extension request is not intended for purposes of delay, but rather to ensure the Return is properly researched and prepared. I would therefore request a second extension of time within which to serve and file the Return to the Petition for Writ of Certiorari.

WHEREFORE, Respondent prays that the Court hold this matter in abeyance until ruling on this motion, and extend the deadline for the service and filing of the Return to the Petition for Writ of Certiorari in this case for thirty (30) days from the date such relief is granted; and for such other and further relief as the Court may deem just and proper.

Respectfully submitted,

ALAN WILSON  
Attorney General

WILLIAM M. BLITCH, JR.  
Assistant Attorney General



WILLIAM M. BLITCH, JR.  
Assistant Attorney General  
S.C. Bar No. 15608

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Post Office Box 11549  
Columbia, SC 29211  
(803) 734-3727

ATTORNEYS FOR RESPONDENT

November 30, 2012

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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Appeal from Williamsburg County  
Honorable George C. James, Circuit Court Judge  
Appellate Case Tracking No. 2012-208606

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The State,

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**PROOF OF SERVICE**

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I, Ellen R. DuBois, certify that I have served the Motion For Second Extension Of Time Within Which To Serve And File Return to Petition for Writ of Certiorari on Petitioner by depositing a copy of same in the United States mail, postage prepaid, addressed to:

Jeremy A. Thompson, Esquire  
Law Office of Jeremy A. Thompson, LLC  
Post Office Box 12891  
Columbia, South Carolina 29211

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

This 30<sup>th</sup> day of November, 2012.

*Ellen R. DuBois*

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ELLEN R. DuBOIS  
Office of Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29211  
(803) 734-3727



ALAN WILSON  
ATTORNEY GENERAL

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S.C. Supreme Court

November 30, 2012

**VIA HAND DELIVERY**

The Honorable Daniel E. Shearouse  
Clerk, South Carolina Supreme Court  
Post Office Box 11330  
Columbia, South Carolina 29211

Re: State v. Robert Troy Taylor  
Appellate Case Tracking No. 2012-208606

Dear Mr. Shearouse:

Enclosed please find the original and six (6) copies of a Motion For Second Extension Of Time Within Which To Serve And File Return to Petition for Writ of Certiorari along with proof of service for filing in the above-referenced appeal.

Sincerely,

William M. Blich, Jr.  
Assistant Attorney General

Enclosures

cc: Jeremy A. Thompson, Esquire  
Victim Services