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S.C. SUPREME COURT

ALAN WILSON  
ATTORNEY GENERAL

July 21, 2017

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

**Re: Mykel Johnson v. State of South Carolina**  
**Appellate Case No. 2016-001684**  
**Lower Court Case No. 2014-CP-07-1759**

Dear Mr. Shearouse:

The Return to Petition for Writ of Certiorari in the above appeal is due to be served and filed on today's date. However, this is to respectfully request a 30-day extension to serve and file this Return.

This extension request is not intended for the purpose of delay. Rather, this extension request is necessitated by a workload.

Sincerely,

Ruston W. Neely  
Assistant Attorney General  
SC Bar No. 100192

RWN/dgr

cc: Susan B. Hackett, Esquire

STATE OF SOUTH CAROLINA  
In The SUPREME COURT

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JUL 24 2017

S.C. SUPREME COURT

Certiorari to Beaufort County  
Court of Common Pleas

The Honorable Brooks P Goldsmith, Circuit Court Judge

Case No. 2016-001684

Mykel Johnson, ..... Petitioner,

v.

State of South Carolina, ..... Respondent.

MOTION FOR EXTENSION OF TIME TO SERVE AND FILE  
RESPONDENT’S RETURN TO PETITION FOR WRIT OF CERTIORARI

COMES NOW the Respondent above named, by and through the undersigned counsel,  
making its motion to Relax Rule 227(g), SCACR, would show unto this Court:

I.

The Respondent respectfully requests a thirty (30) day extension to file the Return to  
Petition for Writ of Certiorari. The Respondent has been working diligently to properly handle  
all (non-capital) PCR matters on behalf of the State for the 1<sup>st</sup> and 14<sup>th</sup> circuit. The Respondent  
was in post-conviction relief court for the dates of May 29-June 2, June 5-9, July 17-20 of this  
year. The Respondent is currently preparing orders of dismissal for the 1<sup>st</sup> and 14<sup>th</sup> circuits. The  
Respondent is also working on, or has submitted briefs/returns, on behalf of the State, for all  
pending appeals in the 1<sup>st</sup> and 14<sup>th</sup> circuits.

Accordingly, and not for the purpose of delaying the Petitioner, the Respondent  
respectfully requests an extension of time to properly research for and prepare the State’s Return  
to the Petition for Writ of Certiorari.

II.

In view of the foregoing, it is respectfully requested that this Court relax Rule 227(g), SCACR, and allow the Respondent another extension of time to file the Return to the Petition for Writ of Certiorari.

WHEREFORE, it is respectfully requested that this Motion be granted.

Respectfully submitted,

ALAN WILSON  
Attorney General

ROBERT BOLCHOZ  
Chief Deputy Attorney General

MEGAN HARRIGAN JAMESON  
Senior Assistant Deputy Attorney General

RUSTON W. NEELY  
Assistant Attorney General

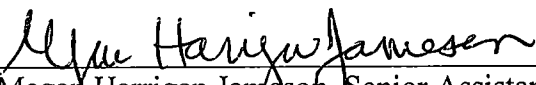
P.O. Box 11549  
Columbia, S.C. 29211  
(803) 734-3737

By:   
ATTORNEYS FOR THE RESPONDENT

In compliance with:

*In Re: Extensions in Criminal and Post-Conviction Relief Cases*, (S.C. Sup. Ct. order dated March 18, 2009) (Davis Adv. Sh. No. 13 at 1).

A 3<sup>rd</sup> request requires that the attorney's "immediate supervisor" consent to the request.

  
Megan Harrigan Jameson, Senior Assistant Deputy Attorney General does hereby consent.

Columbia, South Carolina  
July 21, 2017

STATE OF SOUTH CAROLINA  
In the SUPREME COURT

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Certiorari to Beaufort County  
The Honorable Brooks Goldsmith, Circuit Court Judge

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Appellate Case No. 2016-001684

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Mykel Johnson,

Petitioner,

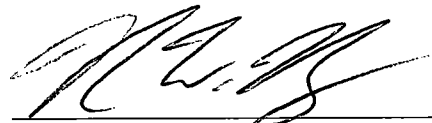
v.

State of South Carolina,

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Respondent,

The undersigned hereby certifies, as an officer of the court, that I have placed this motion for extension of time for respondent's return to petition for writ of certiorari in the mail today, this 21<sup>th</sup> day of July, 2017.



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Ruston W. Neely  
Assistant Attorney General