

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari from Georgetown County
The Honorable George C. James, Jr., Post-Conviction Relief Judge

Appellate Case No. 2017-000280

RECEIVED

SEP 05 2017

S.C. SUPREME COURT

Vladimir Pantovich,

Respondent,

v.

State of South Carolina,

Petitioner.

**MOTION FOR FOURTH EXTENSION TO 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 a writ of certiorari and appendix are due to be served and filed on September 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. In the past few weeks, the

undersigned has submitted a return to petition for writ of certiorari in Brian Evans v. State, as well as a petition for writ of certiorari and reply to return to petition for writ of certiorari in Timothy Young v. State. Additionally, the undersigned appeared on behalf of the State in post-conviction relief hearings for Richland and Kershaw Counties for two weeks recently, one in late July along with last week.

III.

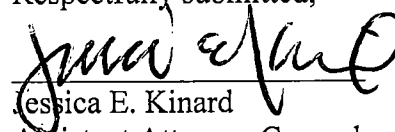
This extension request is not intended for purposes of delay, but rather to ensure that the petition is properly researched and prepared. The petition in the above case arises out of a homicide trial and subsequent post-conviction relief, and raises a complicated issue on appeal. The undersigned is currently working on this petition, expects to have it completed shortly, and therefore requests an extension of time within which to serve and file the petition. The undersigned has contacted opposing counsel, who has consented to this extension as evidenced by his signature below.

WHEREFORE, Petitioner prays the Court extend the deadline for the service and filing of the petition for a 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 Petitioner's motion; and grant such other and further relief as the Court may deem just and proper based upon the above exigent circumstances.

THEREFORE, undersigned counsel for Petitioner respectfully requests a **fourth and final thirty day extension** until **October 5, 2017**, in which to complete and file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances.

Signatures follow.

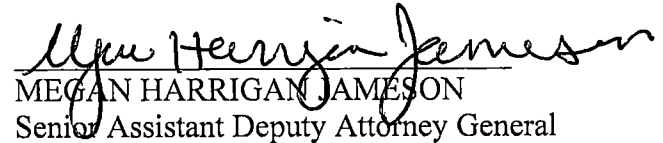
Respectfully submitted,



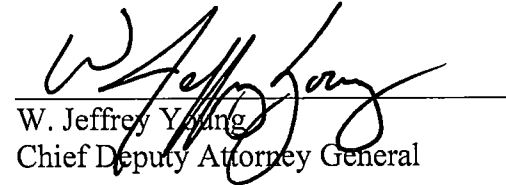
Jessica E. Kinard
Assistant Attorney General
S.C. Bar # 77889

Office of the Attorney General
Post Office Box 11549
Columbia, South Carolina 29211
(803) 734-3737
Attorney for Petitioner

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




MEGAN HARRIGAN JAMESON
Senior Assistant Deputy Attorney General



W. Jeffrey Young
Chief Deputy Attorney General

This 5th day of September, 2017

I consent:


Robert M. Dudek
Appellate Defense

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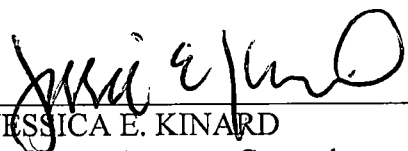
CERTIFICATE OF SERVICE

I, Jessica E. Kinard, hereby certify that I have served the Motion for Fourth Extension to file the Petition for Writ of Certiorari and Appendix, on respondent by depositing a copy of same in the United States Mail, postage prepaid addressed to:

Robert M. Dudek, Esquire
S.C. Commission on Indigent Defense
1330 Lady St., Suite 401
PO Box 11589
Columbia, SC 29211

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

This 5th day of September, 2017



JESSICA E. KINARD

Assistant Attorney General
S.C. Bar # 77889
Office of the Attorney General
Post Office Box 11549
Columbia, South Carolina 29211
(803) 734-3737

ATTORNEY FOR PETITIONER