

RECEIVED  
JUN 15 2018  
S.C. SUPREME COURT

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Aiken County  
Maité Murphy, Circuit Court Judge

\_\_\_\_\_  
Appellate Case No. 2017-002055  
\_\_\_\_\_

CORNELL DEVON TYLER,

Petitioner,

v.

STATE OF SOUTH CAROLINA,

Respondent.

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

Respondent, the State, moves this Court for an additional thirty day extension of time in which to file the Petition for Writ of Certiorari up to and including July 16, 2018. This is Respondent's fourth request for an extension of time in which to file the Return. In support of the request, undersigned counsel would respectfully show the Court:

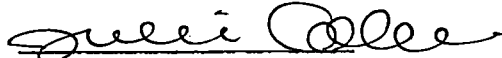
1. The Return to Petition for Writ of Certiorari is due to be filed with the Court today. The Court has granted counsel three previous extensions.
2. Since the third extension was requested, undersigned counsel has drafted several proposed orders for a recent term of PCR court in the Second Circuit, drafted and submitted a Return to Petition for Writ of Certiorari in *Jeron Cook v. State* (Appellate Case No. 2017-000816), drafted and submitted a Return to Petition for Writ of Certiorari in *Terry McCarrell v. State* (Appellate Case No. 2017-001177), prepared for and appeared in court for the PCR hearing of *Levern McCrea v. State* (2012-CP-45-0363),

prepared for and appeared in an oral argument in *Darrell Goss v. State* (Appellate Case No. 2016-002186), and drafted a memorandum for *Sammie Lee Gerrick v. State* (2016-CP-06-0111).

3. Counsel now moves for a fourth extension of time in which to file the Return in order to fully prepare, draft, and submit a meaningful Return.
4. Counsel for Petitioner consents to this request shown by signature below.

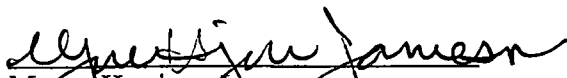
THEREFORE, undersigned counsel for Respondent respectfully requests a **fourth and final thirty (30) day extension until July 16, 2018**, in which to complete and file the Petition for Writ of Certiorari in this case based upon the above exigent circumstances.

Respectfully submitted,



Julie A. Coleman  
Assistant Attorney General  
S.C. Bar # 102214  
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 15<sup>th</sup> day of June, 2018

I consent:



Tricia A. Blanchette  
Counsel for Petitioner

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Aiken County  
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CORNELL DEVON TYLER,

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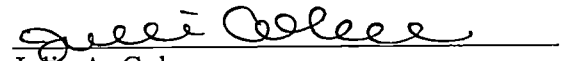
**CERTIFICATE OF SERVICE**

I, Julie A. Coleman, 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:

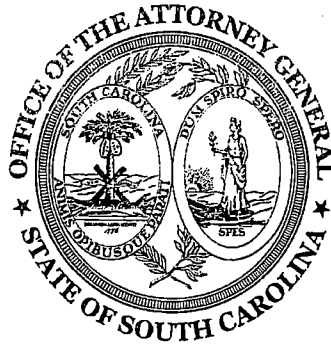
**Tricia A. Blanchette, Esquire  
Law Office of Tricia A. Blanchette, LLC  
Post Office Box 2147  
Leesville, South Carolina 29070**

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

This 15<sup>th</sup> day of June, 2018.

  
\_\_\_\_\_  
Julie A. Coleman  
Assistant Attorney General  
S.C. Bar # 102214  
Office of the Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29211  
(803) 734-3737

ATTORNEY FOR RESPONDENT



ALAN WILSON  
ATTORNEY GENERAL

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S.C. SUPREME COURT

June 15, 2018

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

RE: Cornell D. Tyler v. State of South Carolina  
Appellate Case No. 2017-002055  
Lower Court Case No. 2013-CP-02-2859

Dear Mr. Shearouse:

I am enclosing the original and six (6) copies of the Motion for Fourth Extension to file Return to Petition for Writ of Certiorari in the above case.

Sincerely,

Julie A. Coleman  
Assistant Attorney General

JAC:ces  
Enclosures

cc: Tricia A. Blanchette, Esquire  
Trisha Allen, Victim Services (letter only)