

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Charleston County  
William H. Seals, Circuit Court Judge

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Appellate Case No. 2018-000464

Jerome Campbell,

Petitioner,

v.

State of South Carolina,

Respondent.

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

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Respondent, the State, moves before this Court for an additional thirty day extension of time in which to file the Return to Petition for Writ of Certiorari, up to and including December 17, 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 Respondent three previous extensions. The Court has granted undersigned counsel two previous extensions.
2. This is the fourth request for an extension of time in which to file a response.
3. Counsel appeared on behalf of the State at a PCR term in Dorchester County the week of October 1, 2018. Counsel handled two cases that week, and sat second chair the remainder of the week. These were counsel's first appearances in court, and required

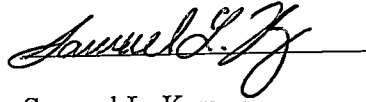
significant preparation. Counsel has drafted orders for the cases handled during this term of court.

4. Counsel appeared on behalf of the State at a PCR term in Florence County the week of November 5, 2018, and is currently drafting orders for the cases heard during this term.
5. Counsel appeared on behalf of the State at a hearing in Sumter County on November 15, 2018, and is appearing on behalf of the State in Sumter County today, November 16, 2018.

This extension request is not intended for purposes of delay, but rather to ensure the Return is properly researched and prepared. The undersigned is currently working on the Return and hopes to have it completed shortly. The undersigned therefore requests an extension of time within which to serve and file the Return. THEREFORE, undersigned counsel for Respondent respectfully requests a **fourth and final thirty-day extension until Monday, December 17, 2018**, in which to complete and file the Return to Petition for Writ of Certiorari in this case based upon the above exigent circumstances. Counsel for Petitioner consents to this request, as indicated by the enclosed email.

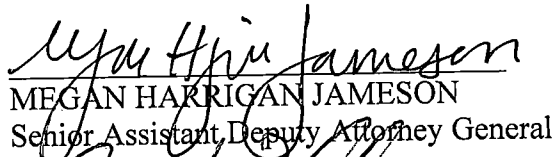
{Signatures on following page.}

Respectfully submitted,

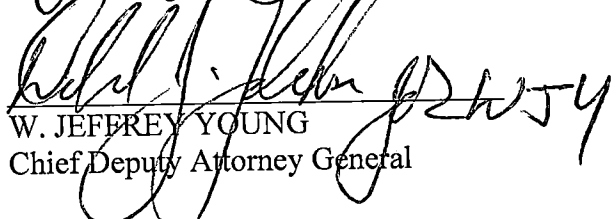


Samuel L. Key  
Assistant Attorney General  
S.C. Bar # 103206  
Office of the Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29211  
(803) 734-3737  
Attorney for Respondent

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



MEGAN HARRIGAN JAMESON  
Senior Assistant Deputy Attorney General



W. JEFFREY YOUNG  
Chief Deputy Attorney General

This 16th day of November, 2018.

## Jennifer Jennison

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**From:** Samuel Key  
**Sent:** Friday, November 16, 2018 11:38 AM  
**To:** Jennifer Jennison  
**Subject:** FW: Jerome Campbell 4th and Final Extension

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Here is the consent from Rauch Wise.

Samuel L. Key  
Assistant Attorney General  
Post-Conviction Relief Section  
Office: (803) 734-2875  
[skey@scag.gov](mailto:skey@scag.gov)

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**From:** Rauch Wise <[rauchwise@gmail.com](mailto:rauchwise@gmail.com)>  
**Sent:** Friday, November 16, 2018 11:19 AM  
**To:** Samuel Key <[SKey@scag.gov](mailto:SKey@scag.gov)>  
**Subject:** Re: Jerome Campbell 4th and Final Extension

I will consent. I did not even know one could apply for a 4th extension. Good to know.

Rauch

On 11/16/2018 5:24 AM, Samuel Key wrote:

Mr. Wise,

I need one final extension to file the return to the petition for a writ of cert. in Jerome Campbell v. State (2018-000464). I was in court last week, yesterday, and I'll be in court this morning. The return is almost complete, and I plan on completing it this weekend. Do you consent?

Thank you,



**Samuel L. Key**  
**Assistant Attorney General**  
Post-Conviction Relief Section

S.C. Attorney General's Office  
Rembert C. Dennis Building  
1000 Assembly St.  
Columbia, SC 29201

**Office: (803) 734-3737**  
[skey@scag.gov](mailto:skey@scag.gov)

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Charleston County  
William H. Seals, Circuit Court Judge  
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Appellate Case No. 2018-000464

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S.C. SUPREME COURT

Jerome Campbell,

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Respondent.

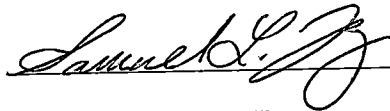
\_\_\_\_\_  
**CERTIFICATE OF SERVICE**

I, Samuel L. Key, hereby certify that I have served the Motion for Fourth Extension to File the Return to Petition for Writ of Certiorari, on Petitioner by sending a copy of same through certified mail, addressed to:

**Clarence Rauch Wise, Esquire  
305 Main St.  
Greenwood, SC 29646**

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

This 16th day of November, 2018

  
\_\_\_\_\_

Samuel L. Key  
Assistant Attorney General  
S.C. Bar # 103206  
Office of the Attorney General  
Post Office Box 11549  
Columbia, SC 29211  
ATTORNEY FOR RESPONDENT



ALAN WILSON  
ATTORNEY GENERAL

RECEIVED

NOV 16 2018

November 16, 2018

S.C. SUPREME COURT

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

**RE: Jerome Campbell v. State of South Carolina**  
**Appellate Case No.: 2018-000464**

Dear Mr. Shearouse:

Enclosed please find the original and six copies of the **Motion for Fourth Extension to File Return to Petition for Writ of Certiorari**, in the above matter for filing in your office. By copy of this letter I am serving opposing counsel with this motion today.

Sincerely,

Samuel L. Key  
Assistant Attorney General

SAK/jaj  
Enclosures

cc: C. Rauch Wise, Esquire (w/enclosure)