

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Beaufort County
Diane Schafer Goodstein, Circuit Court Judge
APPELLATE CASE NO. 2018-000002

ANDRE GREEN,

PETITIONER,

vs.

THE STATE

RESPONDENT

**MOTION TO FILE RETURN TO PETITION FOR WRIT OF CERTIORARI OUT OF
TIME AND FOR A 30-DAY EXTENSION**

Respondent, State of South Carolina, through its undersigned counsel, hereby moves to file the return to Applicant's petition for writ of certiorari out of time and for a 30-day extension to file this document. In support of this Motion, Respondent submits the following:

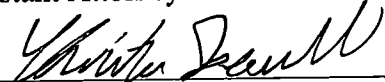
1. The return to petition for writ of certiorari was initially due to be filed and served December 27, 2018. However, due to an administrative error, the date to file the document was inadvertently overlooked.
2. The Respondent requests an additional 30 days to file these documents.
3. Counsel for Respondent has contacted Petitioner's Counsel, who has consented to this request.
3. The undersigned assures the Court completion of the return is a high priority, and he will work diligently to complete the return to petition for writ of certiorari.

Based on the foregoing, Respondent respectfully requests this Court hold this matter in abeyance pending resolution of this Motion, and grant Respondent's request for a 30-day extension of time to file and serve the return to petition for writ of certiorari in this appeal.

Respectfully submitted,

ALAN WILSON
Attorney General

CHRISTIAN SAVILLE
Assistant Attorney General

BY:  _____

Office of the Attorney General
PO Box 11549
Columbia, SC 29211
803-734-3739

January 4, 2019

STATE OF SOUTH CAROLINA
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ANDRE GREEN,

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STATE OF SOUTH CAROLINA,


Respondent.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the **Motion to File Return to Petition for Writ of Certiorari Out of Time and for a 30-Day Extension**, has been served upon opposing counsel by mailing two (2) copies in the United States mail, postage prepaid:

Taylor D. Gilliam, Esquire
SC Commission on Indigent Defense
Post Office Box 11589
Columbia, South Carolina 29211-1589

This 4th day of January, 2019



CAROLINE COLLINS
Administrative Coordinator



ALAN WILSON
ATTORNEY GENERAL

RECEIVED

JAN 04 2019

S.C. SUPREME COURT

January 4, 2019

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

Re: Andre Green v. State of South Carolina
Appellate Case No. 2018-000002
Lower Court Case No. 2014-CP-07-0359

Dear Mr. Shearouse:

Enclosed please find the original and six (6) copies of the **Motion to File Return to Petition for Writ of Certiorari Out of Time and for a 30-Day Extension**. By copy of this letter we are serving opposing counsel today.

Sincerely,

Christian Saville
Assistant Attorney General
SC Bar No. 103272

CS/cc
Enclosures

cc: Taylor D. Gilliam, Esquire (2 copies)