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S.C. SUPREME COURT

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

APPEAL FROM COLLETON COUNTY

Court of Common Pleas

The Honorable Jennifer B. McCoy, Circuit Court Judge

Case No. 2017-CP-15-00383

Andre T. Richardson, #336692,

PETITIONER,

v.

State of South Carolina,

RESPONDENT.

Appellate Case No.: 2019-000212

MOTION FOR EXTENSION OF TIME TO SERVE AND FILE
PETITIONER'S PETITION FOR WRIT OF CERTIORARI

COMES NOW the Petitioner above named, by and through the undersigned counsel, pursuant to Rule 240, SCACR, making its motion to relax Rule 243(d), SCACR, would show unto this Court:

I.

An extension request was filed on November 25, 2019, requesting 30 days additional time to file the Petition for Writ of Certiorari. By Order dated November

1911-12

1912-13

1913-14

25, 2019, this Court informed the Petitioner that the Petitioner's filings were due by December 23, 2019.

The Petitioner respectfully requests another extension to file the Petition for Writ of Certiorari. The Petitioner has been working diligently to complete the petition. The Appendix is quite large and involves a lengthy trial transcript. Attorney for Petitioner also handles contract work for the Sixth Circuit Solicitor's Office. Attorney for Petitioner was in General Sessions Court November 12 & 13 as well as the week of November 18, 2019. The week of November 25, 2019 was the week of Thanksgiving and Attorney for Petitioner went out of town to see family. Furthermore, the week of December 9, 2019 Attorney for Petitioner was also in General Sessions Court.

Attorney for Petitioner plans to use the last two weeks of the year to get the Petition written and filed. Accordingly, and not for the purpose of delay, the Petitioner respectfully requests an extension of time to properly research for and prepare the Petition for Writ of Certiorari.

II.

In view of the foregoing, it is respectfully requested that this Court relax Rule 243(d), SCACR, and allow the Petitioner another extension of time to file the Petition for Writ of Certiorari.

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

Respectfully submitted,


ASHLEY A. MCMAHAN, ESQUIRE

MCMAHAN & TAYLOR, ATTORNEYS, LLC

PO Box 5501
West Columbia, SC 29171
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SC Bar No.: 71676

ATTORNEY FOR PETITIONER

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).


I do hereby consent:

I do hereby consent:


APRIL N. TAYLOR

McMahan & Taylor Attorneys, LLC

ⓧ signed with permission


MEGAN HARRIGAN JAMESON
Sr. Asst. Deputy Attorney General

Cayce, South Carolina
December 18th, 2019