

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

CERTIORARI TO LEXINGTON COUNTY
Court of Common Pleas
The Honorable Walton J. McLeod, IV, PCR Judge

Appellate Case No. 2019-001060

ANDREW E. TORRENCE,

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 Return to Petition for Writ of Certiorari, **up to and including March 3, 2020**. 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 on Monday, February 3, 2020. The Court has granted counsel three previous extensions.
2. This is the fourth request for an extension of time in which to file a response.
3. Since Counsel's last request for an extension, Counsel has prepared for and represented Respondent in Post-Conviction Relief terms held in the 13th Circuit

on December 16-20, 2019, and January 20-24, 2020.

4. Over the past month, Counsel has also drafted a substantive proposed order in the case of Carl Stanley Aiken v. State (2019-CP-23-0484) and filed a Return to Petition for Writ of Certiorari in Robert A. Baker v. State (2018-001854)
5. Counsel is diligently drafting the Return to Petition for Writ of Certiorari in Andra Jamison v. State (2019-000031);
6. Counsel is simultaneously preparing for the upcoming term of Post-Conviction Relief in the 10th Circuit, to be held February 17-21, 2020;
7. Greater specificity as to the undersigned's workload can be provided upon request.

This extension request is not intended for purposes of delay, but rather to ensure that the Return is properly researched and prepared. The Petition raises multiple issues, and 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 **Tuesday, March 3, 2020**, 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 has given her consent to this extension via email.

Respectfully submitted,

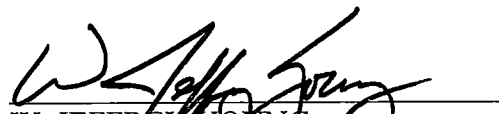


Lillian L. Meadows
Assistant Attorney General
S.C. Bar # 103665
Office of the Attorney General
Post Office Box 11549
Columbia, South Carolina 29211
(803) 734-0964
Attorney for Respondent

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



MEGAN HARRIGAN JAMESON
Senior Assistant Deputy Attorney General



W. JEFFREY YOUNG
Chief Deputy Attorney General

This 3rd day of February, 2020.

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Lexington County
The Honorable Walton J. McLeod, IV, PCR Judge

Appellate Case No. 2019-001060

Andrew E. Torrence

Petitioner,

v.

State of South Carolina,

Respondent.

CERTIFICATE OF SERVICE

I, Lillian L. Meadows, 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 interagency mail, addressed to:

Tricia A. Blanchette, Esq.
Law Office of Tricia A. Blanchette
P.O. Box 2147
Leesville, South Carolina 29070

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

This 3rd day of February, 2020.

Lillian L. Meadows
Assistant Attorney General
S.C. Bar # 103665
Office of the Attorney General
Post Office Box 11549
Columbia, South Carolina 29211
(803) 734-0964
Attorney for Respondent

Lilly Meadows

From: Tricia Blanchette <blanchettelaw@gmail.com>
Sent: Monday, February 3, 2020 3:08 PM
To: Lilly Meadows
Subject: Re: Andrew Torrence RPWC
Attachments: image001.jpg

Please consider this email verification of consent.

Thanks,

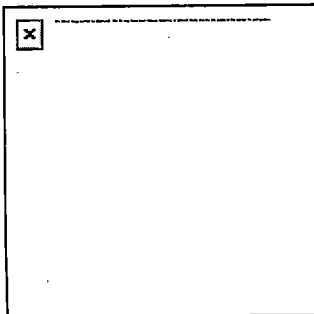
Tricia Blanchette

On Mon, Feb 3, 2020, 10:06 AM Lilly Meadows <LillyMeadows@scag.gov> wrote:

Great! I have not noticed anything missing from the Appendix, but I will certainly let you know if I find anything. Also, I got this case mixed up with another of Sherrie's that I inherited from her when it was already on a 2nd extension. I received this one from her before you filed the PWC. Just wanted to correct myself on that and get a confirmation email from you that I can attach and file with the extension motion.

Thank you!

Lilly



Lillian L. Meadows

Assistant Attorney General

Post-Conviction Relief Division

S.C. Attorney General's Office

Rembert C. Dennis Bldg.

1000 Assembly St.

Columbia, SC 29201

Office: 803-734-0964

lillymeadows@scag.gov

From: Tricia Blanchette <blanchettelaw@gmail.com>
Sent: Monday, February 3, 2020 9:25 AM
To: Lilly Meadows <LillyMeadows@scag.gov>
Subject: Re: Andrew Torrence RPWC

Yes. I am in Rock Hill all day, so I can't sign anything today. Also, as you go through the Appendix, please let me know if I overlooked or omitted anything.

On Mon, Feb 3, 2020, 8:56 AM Lilly Meadows <LillyMeadows@scag.gov> wrote:

Good Morning, Tricia,

I hate to do this, but I'm going to need a fourth extension on the RPWC for Andrew Torrence. I inherited the case when it was already on a 2nd extension and, as you know, the record is extensive. Do I have your consent?

Thank you!

Lilly

Lillian L. Meadows

Assistant Attorney General

Post-Conviction Relief Division

S.C. Attorney General's Office

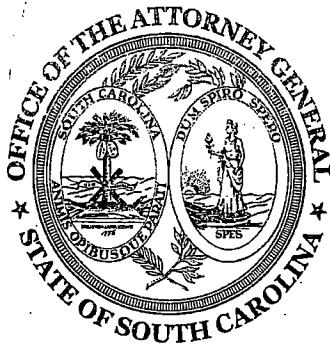
Rembert C. Dennis Bldg.

1000 Assembly St.

Columbia, SC 29201

Office: 803-734-0964

lillymeadows@scag.gov



ALAN WILSON
ATTORNEY GENERAL

February 3, 2020

RECEIVED
FEB 03 2020
S.C. SUPREME COURT

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

Re: Andrew E. Torrence v. State of South Carolina
Appellate Case No. 2019-001060
Lower Court Case No. 2015-CP-32-01993

Dear Mr. Shearhouse:

Enclosed please find the original and six (6) copies of the **Motion for Fourth Extension to File Return to Petition for Writ of Certiorari**. By copy of this letter we are serving Petitioner today.

Sincerely,

Lillian L. Meadows
Assistant Attorney General
SC Bar #103665

LLM/ch

cc: Tricia A. Blanchette, Esquire