

THE STATE OF SOUTH CAROLINA
In the Supreme Court

CERTIORARI TO YORK COUNTY
Court of Common Pleas
Post-Conviction Relief

Roger E. Henderson, Post-Conviction Relief Judge
John C. Hayes, III, Trial Judge

Appellate Case No.: 2019-000655

Antonio L. Robbins,.....

vs.

State of South Carolina,Respondent.

MOTION TO FILE REPLY
OUT OF TIME

Comes now, Tommy A. Thomas, Counsel for Petitioner, who respectfully makes this Motion to File Reply Out of Time:

That the delivery of the Return to Petition for Writ of Certiorari from the State to Counsel's office was severely delayed in that the same was not received until February 19, 2020. (The State's letter and certificate of service are dated January 30, 2020.)

That, due to the rarity with which Counsel files replies, the due date was miscalendared.

That Counsel for Petitioner has spoken with Counsel for Respondent who has no opposition to this document being filed out of time.

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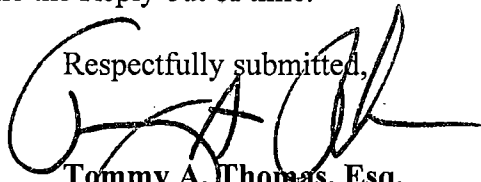
S.C. SUPREME COURT

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SC Court of Appeals

That, as it will not cause undue delay or prejudice to Respondent, Petitioner respectfully requests the court grant this request to file the Reply out of time.

Respectfully submitted,

Tommy A. Thomas, Esq.
S.C. Bar No.: 005536
Attorney for Petitioner,

P. O. Box 88
Irmo, SC 29063

March 10, 2020

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM YORK COUNTY
Court of Common Pleas
Post Conviction Relief

Roger E. Henderson, Circuit Court Judge

Case No.: 2019-000655

Antonio L. Robbins #300579, Petitioner,

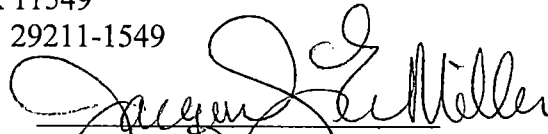
vs.

State of South Carolina,Respondent.

CERTIFICATE OF SERVICE

I, Jacquelyn E. Miller, secretary to Tommy A. Thomas, Attorney for the Applicate hereby certify that I placed in the United States Mail, a copy of a Reply to Return to Petition for Writ of Certiorari and Motion to File Reply out of Time with postage prepaid and the return address clearly shown on said envelope to Janell H. Gregory, Esq. of the Attorney General's Office, at:

Janell H. Gregory, Esq.
Attorney General's Office
P.O. Box 11549
Columbia, SC 29211-1549



Jacquelyn E. Miller
Secretary to Tommy A. Thomas
Attorney for Applicant
P.O. Box 88
Irmo, SC 29063
(803) 732-5507

Irmo, SC
March 10, 2020

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SC Court of Appeals

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SC Court of Appeals

March 10, 2020

The South Carolina Supreme Court
Daniel E. Shearouse, Clerk of Court
P.O. Box 11330
Columbia, SC 29211

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S.C. SUPREME COURT

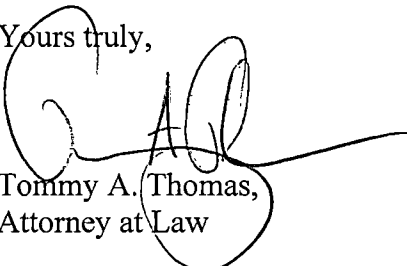
RE: Antonio L. Robbins v. State of South Carolina
Appellate Case No.: 2019-000655

Dear Sir or Madam:

Enclosed please find for filing an original and a copy of a Motion to file Reply out of Time as well as an original and six copies of a Reply to Return to Petition for Writ of Certiorari.

Kindly return the clocked copies to me in the enclosed envelope. Please feel free to contact me should you have any questions.

Yours truly,


Tommy A. Thomas,
Attorney at Law

TAT/jem
cc: Janell Gregory, Esq.
Antonio L. Robbins

THOMAS LAW
P.O. BOX 88, IRMO, SC 29063

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SC Court of Appeals

The South Carolina Supreme Court
Daniel E. Shearouse, Clerk of Court
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