

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

CERTIORARI TO LEXINGTON COUNTY
Court of Common Pleas
The Honorable R. Keith Kelly, PCR Judge

Appellate Case No. 2019-000695

RECEIVED

May 18 2020

S.C. SUPREME COURT

WILLIAM BROCKMEYER,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT.

**MOTION FOR FIFTH 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 June 18, 2020**. This is Respondent's fifth 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, May 18, 2020. The Court has granted counsel four previous extensions.
2. This is the fifth request for an extension of time in which to file a response.
3. Over the past month, Counsel has also filed a Return to Petition for Writ of Certiorari in Sexton v. State (2019-00424) and Martin v. State (2019-000604).

4. Counsel has also filed Returns in the Circuit Court for Jamie Lamont Stroman v. State (2019-CP-32-04074); Crystal Chambers v. State (2019-CP-37-456); Jonathan Day v. State (2019-CP-23-07166); Daniel Winford v. State (2019-CP-23-5922); Donald Young v. State (2019-CP-23-5902); Garvin Duvall v. State (2018-CP-04-2357); and Lamar Ray v. State (2019-CP-32-01889).
5. Counsel has also drafted proposed Final Orders of Dismissal for the George Douglas v. State 2018-CP-32-02660; Garvin Duvall v. State (2018-CP-04-2357); Charles Pickens v. State (2018-CP-04-01951); Fredrico Ridley v. State (2018-CP-04-01349); and Scott Parker v. State (2018-CP-32-03877).
6. Counsel is simultaneously preparing for the upcoming term of Post-Conviction Relief in the 11th Circuit, to be held June 15–19, 2020. Since this will be the first Post-Conviction Relief term in the state since the COVID-19 pandemic, Counsel has been diligently working with the Chief Administrative Judge on logistical issues associated with preparing the roster.
7. Greater specificity as to the undersigned's workload can be provided upon request.

The undersigned counsel submits this extension request is supported by extraordinary circumstances and is not intended for purposes of delay. 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 **fifth and final thirty-day extension** until **Thursday, June 18, 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 consents to this request through interagency agreement between Appellate Defense and Respondent.

Respectfully submitted,

s/LillianMeadows
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**We concur that extraordinary circumstances
have been shown**

s/Megan Harrigan Jameson
MEGAN HARRIGAN JAMESON
Senior Assistant Deputy Attorney General

s/ Donald J. Zelenka
DONALD J. ZELENKA
Deputy Attorney General

This 18th day of May, 2020.