

STATE OF SOUTH CAROLINA
In The Supreme Court

CERTIORARI TO RICHLAND COUNTY
Court of Common Pleas

The Honorable James R. Barber, III, Trial Judge
The Honorable Clifton Newman, PCR Judge

Appellate Case No. 2019-001925

RECEIVED

Jun 22 2020

S.C. SUPREME COURT

Stewart Randall Ard, #217645,

Respondent,

v.

State of South Carolina,

Petitioner.

**MOTION FOR FOURTH EXTENSION TO FILE
PETITION FOR WRIT OF CERTIORARI**

Petitioner, the State, moves this Court for an additional thirty-day extension of time in which to file the Petition for Writ of Certiorari, up to and including **Wednesday, July 22, 2020**. This is Respondent's fourth request for an extension of time in which to file the petition. In support of the request, undersigned counsel would respectfully show the Court:

1. The Petition for Writ of Certiorari is due to be filed with the Court today. 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. Counsel is currently on maternity leave following the birth of her daughter on April 25, 2020.

4. Since Counsel's last request for an extension, Counsel has filed a return to petition for certiorari in Victor D. Smith v. State (2019-000549) and a petition for rehearing in the Court of Appeals in Hubert Brown v. State (2016-001363).
5. Additionally, an IT issue prevented Counsel for Petitioner from working on this petition over the past weekend.

This extension request is not intended for purposes of delay, but rather to ensure the Petition is properly researched and prepared. The undersigned is currently working on the Petition and hopes to have it completed shortly. The undersigned therefore requests an extension of time within which to serve and file the Petition. Counsel for Respondent has consented to this request.

THEREFORE, undersigned counsel for Respondent respectfully requests a **fourth and final thirty-day extension** until **Wednesday July 22, 2020**, in which to complete and file the Petition for Writ of Certiorari in this case based upon the above exigent circumstances. Counsel for Respondent has consented to the extension request.

Respectfully submitted,

s/ Lindsey A. McCallister

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Attorney for Respondent

**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 22nd day of June, 2020.