

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Jul 15 2020

CERTIORARI TO ORANGEBURG COUNTY  
Court of Common Pleas

S.C. SUPREME COURT

The Honorable Robert E. Hood, PCR Judge  
The Honorable Maite Murphy, Trial Judge

Appellate Case No. 2019-000812

LEROY GLOVER, JR., SCDC #314746

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT.

**MOTION FOR FIFTH EXTENSION TO FILE  
RETURN TO PETITION FOR WRIT OF CERTIORARI AND BRIEF OF  
RESPONDENT PURSUANT TO WHITE V. STATE**

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 and Brief of Respondent Pursuant to White v. State, **up to and including August 15, 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 and Brief of Respondent pursuant to White v. State is due to be filed with the Court today, July 15, 2020. The Court has granted Respondent four previous extensions.

2. This request for an extension is not intended for the purposes of delay, but rather, is due to an extraordinarily high workload undersigned counsel presently has. Specifically, undersigned counsel assumed representation in this case, as well as number of other appeals arising from the First and Fourteenth Circuit post-conviction relief cases, as well as the circuit court caseload for the First and Fourteenth Circuits, when the former Assistant Attorney General handling those circuits with undersigned counsel left the Office of the Attorney General.
3. Over the past month, Counsel has also filed a Return to Petition for Writ of Certiorari in Robert Steed v. State (2019-00509) and Terrell L. McCoy (2019-001193).
4. Counsel has also filed Returns in the Circuit Court for Terrance Seabrook v. State (2020-CP-07-0369); Justin Watts v. State (2019-CP-07-798); John Singleton v. State (2019-CP-10-6547); Jontez Ward v. State (2019-CP-10-4507); Winston Smith v. State (2011-CP-15-0720); Kenneth Barr v. State (2013-CP-15-1224); Nathaniel Hambleton v. State (2019-CP-15-805); Julius Rooks-Mcbean (2019-CP-07-2727); Chellis Gant v. State (2020-CP-10-647); Dean Seagers v. State (2020-CP-10-527); and Shayla Bryan v. State (2017-CP-07-1405).
5. 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 Brief, both will be completed shortly. The undersigned therefore requests an extension of time within which to serve and file the Return and Brief.

THEREFORE, undersigned counsel for Respondent respectfully requests a **fifth and final thirty-day extension** until **August 15, 2020**, in which to complete and file the return to petition for writ of certiorari and brief of respondent pursuant to White v. State in this case based upon the above exigent circumstances. Counsel for Petitioner has no objection to this request.

Respectfully submitted,

s/ Benjamin Limbaugh  
Benjamin Limbaugh  
Assistant Attorney General  
S.C. Bar # 103334

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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 15<sup>th</sup> day of July, 2020.