



RECEIVED
Jul 20 2020
S.C. SUPREME COURT

ALAN WILSON
ATTORNEY GENERAL

July 20, 2020

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

Re: Stanley Wright, v. State of South Carolina
Appellate Case No. 2019-000676

Dear Mr. Shearouse:

Attached please find Respondent's Motion to File a Fourth Extension for Respondent's Return to the Petition for Writ of Certiorari in the above-referenced post-conviction relief appeal.

Sincerely,

s/ Benjamin Limbaugh

Benjamin Hunter Limbaugh
Assistant Attorney General
SC Bar No. 103334

BHL/kmw

cc: Sarah E. Shipe, Esquire

RECEIVED

Jul 20 2020

S.C. SUPREME COURT

STATE OF SOUTH CAROLINA
In The Supreme Court

CERTIORARI TO BEAUFORT COUNTY
Court of Common Pleas

Kristi L. Harrington, Trial Judge
Jennifer B. McCoy, PCR Judge

Appellate Case No. 2019-000676

STANLEY WRIGHT,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT.

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

Respondent moves before this Court for a fourth thirty-day extension of time in which to file the Return to Petition for Writ of Certiorari, up to and including August 19, 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 Court¹:

1. The return to petition for a writ of certiorari is due to be filed with the Court today. The Court has granted Respondent three 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

¹ In compliance with: *In Re: Extensions in Criminal and Post-Conviction Relief Cases*, (S.C. Sup. Ct. order dated March 18, 2009) (Davis Adv. Sh. No. 13 at 1).

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.

This extension request is not intended for purposes of delay, but rather to ensure that the return is properly researched and prepared. 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 **Thursday August, 19, 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 by email.

Respectfully submitted,

s/ Benjamin Limbaugh

BENJAMIN LIMBAUGH
Assistant Attorney General
S.C. Bar # 103334
Office of the Attorney General
Post Office Box 11549
Columbia, South Carolina 29211
(803) 734-3737
Attorney for Respondent

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

s/ Megan Harrigan Jameson

MEGAN HARRIGAN JAMESON
Senior Assistant Deputy Attorney General

This 20th day of July, 2020.

s/ Donald J. Zelenka

DONALD J. ZELENKA
Deputy Attorney General

From: Benjamin Limbaugh
Sent: Monday, July 20, 2020 12:14 PM
To: 'Shipe, Sarah'
Subject: RE: [External] Stanley Wright RPWC Extension
Attachments: Fourth Extension Draft (02330261xD2C78).pdf

Good afternoon Ms. Shipe,

I sincerely appreciate you consenting to my extension request. Please find the request attached. I will be filing shortly, along with a copy of this email. If there is anything else you need please feel free to ask.

Thank you,
Ben



Benjamin Limbaugh
A.A.G.
Post-Conviction Relief
Section

S.C. Attorney General's
Office
Rembert C. Dennis Building
1000 Assembly St.
Columbia, SC 29201
(803)-734-4124
blimbaugh@scag.gov