

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

APPEAL FROM HORRY COUNTY

RECEIVED
Feb 05 2021
S.C. SUPREME COURT

Court of Common Pleas

The Honorable Kristi F. Curtis, Circuit Court Judge

Case No. 2015-CP-26-02839

Bruce A. Hill, #223106,

PETITIONER,

v.

State of South Carolina,

RESPONDENT.

Appellate Case No.: 2019-001695

MOTION FOR EXTENSION OF TIME TO SERVE AND FILE
PETITIONER'S PETITION FOR WRIT OF CERTIORARI

COMES NOW the Petitioner above named, by and through the undersigned counsel, pursuant to Rule 240, SCACR, making its motion to relax Rule 243(d), SCACR, would show unto this Court:

I.

An extension request was filed on January 6, 2021, requesting 30 days additional time to file the Petition for Writ of Certiorari. By Order dated January 6,

2021, this Court informed the Petitioner that the Petitioner's filings were due by February 5, 2021.

The Petitioner respectfully requests another extension to file the Petition for Writ of Certiorari. The Petitioner has been working diligently to complete the petition. The Appendix is quite large and involves a lengthy trial transcript. Attorney for Petitioner also handles contract work for the Sixth Circuit Solicitor's Office. Attorney for Petitioner was in General Sessions Court and Post-Conviction Relief Court earlier in January. Attorney for Petitioner also has been dealing with some personal health issues during this time that has prevented her from being able to fully finish the Petition in a timely manner.

Accordingly, and not for the purpose of delay, the Petitioner respectfully requests an extension of time to properly finish the Petition for Writ of Certiorari.

II.

In view of the foregoing, it is respectfully requested that this Court relax Rule 243(d), SCACR, and allow the Petitioner another extension of time to file the Petition for Writ of Certiorari.

WHEREFORE, it is respectfully requested that this Motion be granted.

Respectfully submitted,



ASHLEY A. MCMAHAN, ESQUIRE

McMAHAN & TAYLOR, ATTORNEYS, LLC

PO Box 50536

Columbia, SC 29250

803-219-1110

SC Bar No.: 71676

ATTORNEY FOR PETITIONER

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).

I do hereby consent:



APRIL N. TAYLOR

McMahan & Taylor Attorneys, LLC

I do hereby consent:

MEGAN HARRIGAN JAMESON

Sr. Asst. Deputy Attorney General

Columbia, South Carolina

February 5, 2021



Ashley McMahan <ashley@macvance.com>

Ext Request

2 messages

Ashley McMahan <ashley@mcmahantaylor.com>
To: Megan Jameson <MJameson@scag.gov>

Mon, Feb 1, 2021 at 2:44 PM

Megan-

Would you kindly consent to a fourth extension request for the Bruce A. Hill PCR appeal?

Best regards,

Ashley A. McMahan
Attorney at LawPO Box 50536
Columbia, SC 29250
803-219-1110

Megan Jameson <MJameson@scag.gov>
To: Ashley McMahan <ashley@mcmahantaylor.com>

Mon, Feb 1, 2021 at 2:51 PM

Ashley,

The State consents to this extension request.

Thank you,

Megan Harrigan Jameson
Senior Assistant Deputy Attorney General
Post-Conviction Relief Section
S.C. Attorney General's Office

From: Ashley McMahan <ashley@mcmahantaylor.com>
Sent: Monday, February 1, 2021 2:44 PM
To: Megan Jameson <MJameson@scag.gov>
Subject: Ext Request

[Quoted text hidden]