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S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In the Supreme Court

Appeal from Pickens County Court of General Sessions
The Honorable Robin Stillwell., Circuit Court Judge

Appellate Case No. 2020-001595

State of South Carolina,....., Appellant

v.

Charles Rampey,..... Respondent.

MOTION TO ACCEPT FOR LATE FILING

NOW COMES Respondent, by and through undersigned counsel, and would respectfully move this Honorable Court to accept for late filing the Return to Petition for Writ of Certiorari.

This motion follows one of our office staff member’s positive result for Covid-19 and the consequent increased measures of social distancing, working from home, and closing of the office. Counsel simultaneously also experienced recurrent significant issues with an older Mac I had been using which caused a loss of work and backups, and consequently, the need to rewrite whole sections of this pleading as well as others.

This motion is not made with any intention to cause further delay or inconvenience. Counsel submits that good cause exists for accepting for filing out of time the Return to Petition for Writ of Certiorari.

WHEREFORE Counsel for Respondent respectfully urges this Honorable Court to accept for late filing the Return to Petition for Writ of Certiorari.

Respectfully Submitted,

William G. Yarborough III
/s/ Lauren C. Hobbs, #103190
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