

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

RECEIVED

Apr 12 2021

SC Court of Appeals

Appeal from Beaufort County  
Honorable Carmen T. Mullen, Circuit Court Judge  
Appellate Case Tracking No. 2020-000110

Nathaniel Johnson, Jr.,

Petitioner,

vs.

The State,

Respondent.

**MOTION FOR THIRD EXTENSION OF TIME TO SERVE AND FILE  
RETURN TO PETITION FOR WRIT OF CERTIORARI**

Respondent, through its undersigned counsel, would respectfully show unto this Court as follows:

I.

The Return to the Petition for Writ of Certiorari is due to be served and filed today, April 12, 2021.

II.

Pursuant to RE: Extension Requests in Criminal Direct Appeals and Post-Conviction Relief Certiorari Proceedings: Order of the South Carolina Supreme Court dated March 18, 2009, the Respondent moves for a third extension in the above referenced appeal. Due to the issues raised and work required in other cases pending before this Court and the South Carolina Supreme Court, I am unable to complete this return on time. The undersigned has completed several filings so far this month including a Return to Certiorari in State v. Dalen and an Initial

Brief in State v. Keitt. The undersigned is currently working on a case involving the Protection of Persons and Property Act which has previously been considered by the Supreme Court and remanded for a new immunity hearing. The undersigned has also provided technical assistance to numerous attorneys with oral arguments conducted via WebEx and has devoted considerable time preparing for his own argument in State v. Eubanks, which has twelve issues on appeal.

III.

This extension request is not intended for purposes of delay, but rather to ensure the Return is properly researched and prepared. I would, therefore, request a third extension of time within which to serve and file the Return to Petition for Writ of Certiorari.

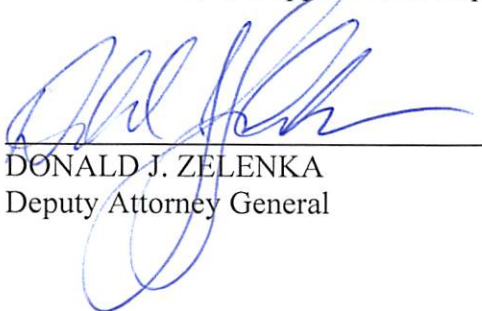
WHEREFORE, Respondent prays that the Court hold this matter in abeyance until ruling on this motion, and extend the deadline for the service and filing of the Return to Petition for Writ of Certiorari in this case for thirty (30) days from the date such relief is granted; and for such other and further relief as the Court may deem just and proper.

Respectfully submitted,


ALAN WILSON  
Attorney General

WILLIAM M. BLITCH, JR.  
Senior Assistant Deputy Attorney General

I have reviewed and approve this request:



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DONALD J. ZELENKA  
Deputy Attorney General



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WILLIAM M. BLITCH, JR.  
S.C. Bar No. 15608  
Office of the Attorney General  
Post Office Box 11549  
Columbia, SC 29211  
(803) 734-3727

ATTORNEYS FOR RESPONDENT

April 12, 2021

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**PROOF OF SERVICE**

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I, Caroline Collins, certify that I have served the Motion for Third Extension of Time to Serve and File Return to Petition for Writ of Certiorari on Petitioner by depositing in the US Mail, postage prepaid, addressed to:

Nathaniel Johnson, Jr., *Pro se* Petitioner  
SCDC # 211574, BBB-0026-B  
Allendale Correctional Institution  
Post Office Box 1151  
Fairfax, South Carolina 29827

I further certify that all parties required by Rule to be served have been served.

This 12<sup>th</sup> day of April, 2021.



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CAROLINE COLLINS  
Administrative Coordinator  
Office of Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29211  
(803) 734-3727