

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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S.C. SUPREME COURT

CERTIORARI TO RICHLAND COUNTY
Court of Common Pleas

The Honorable Jocelyn Newman, PCR Judge
The Honorable G. Thomas Cooper, Trial Judge

Appellate Case No. 2020-000712

Fred Jack Sanders,

Petitioner,

v.

State of South Carolina,

Respondent.

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

Counsel for Respondent moves this Court for an additional ten-day extension of time in which to file the Return to Petition for Writ of Certiorari, up to and including **Monday, May 3, 2021**. 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 Court:

1. The Return to Petition for Writ of Certiorari is due to be filed with the Court today.
The Court has granted Counsel three previous extensions.
2. This is the fourth request for an extension of time in which to file a response.
3. Since Counsel's last request for an extension, Counsel appeared for oral argument before the Court of Appeals in Travis Hines v. State, and appeared for the State in

virtual evidentiary hearings in the Fifth Circuit the week of April 12-16.

4. Counsel has been absent from work on family sick leave to care for her young child on seven of the last twelve work days.
5. Counsel is now herself actively ill with a stomach virus.

This extension request is not intended for purposes of delay, but rather to ensure 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. Counsel for Petitioner has consented to this request pursuant to interagency agreement.

THEREFORE, undersigned counsel for Respondent respectfully requests a **fourth and final ten-day extension** until **Monday, May 3, 2021**, 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 has consented to the extension request pursuant to interagency agreement.

Respectfully submitted,

s/ Lindsey A. McCallister

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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 21st day of April, 2021.