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Feb 14 2022

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

ON WRIT OF CERTIORARI TO GREENVILLE COUNTY
Court of Common Pleas
The Honorable Edward W. Miller, Plea Judge
The Honorable J. Mark Hayes, II, Post-Conviction Relief Judge

Appellate Case No. 2020-001361

OSHAUN ROBINSON,

RESPONDENT,

v.

THE STATE

PETITIONER.

**MOTION FOR EXTENSION OF TIME TO FILE
RETURN TO MOTION FOR APPEAL BOND**

The State, through its undersigned counsel, would respectfully show unto this Court the following:

1. On February 3, 2022, Oshaun Robinson filed a petition seeking this Court to grant him an appeal bond. Pursuant to Rule 240(e), SCACR, and this Court's February 4, 2022, letter, the State's return to this motion is due to be served on or before February 14, 2022.
2. This post-conviction relief appeal pertains to convictions of assault and

battery with intent to kill, armed robbery, and criminal conspiracy to which Robinson pleaded guilty on March 4, 2009.

3. Pursuant to Rule 263, SCACR, the State respectfully requests a ten-day extension until Thursday, February 24, 2022, to serve its return to Robinson's motion for an appeal bond. This extension is not intended for delay, but is to allow time to prepare a meaningful response to this motion, including time to consult with the victim to ensure his position is fully and properly presented to the Court. One of the State's investigators is currently working with the Greenville County Sheriff's Office to locate the victim.

THEREFORE, undersigned counsel for the State respectfully requests a ten-day extension until February 24, 2022, in which to serve its return to Robinson's motion for an appeal bond.

Respectfully submitted,

ALAN WILSON
Attorney General

s/LillianMeadows
LILLIAN L. MEADOWS
Assistant Attorney General
S.C. Bar No. 103665

February 14, 2022

ATTORNEYS FOR PETITIONER

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CERTIFICATE OF SERVICE

Pursuant to Rule 262(c)(3), SCACR, the undersigned hereby certifies a true copy of the Motion for Extension of Time to File Return to Motion for Appeal Bond has been served upon opposing counsel, Tara D. Shurling, Esquire, by sending to opposing counsel's primary e-mail address as listed in the Attorney Information System (AIS):

Tara D. Shurling, Esquire
tdslaw@shurlinglaw.com

This 14th day of February, 2022.

s/LillianMeadows

LILLIAN L. MEADOWS
Assistant Attorney General
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SC Court of Appeals

ALAN WILSON
ATTORNEY GENERAL

February 14, 2022

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
PO Box 11629
Columbia, South Carolina 29211
(via email: ctappfilings@sccourts.org)

Re: Oshaun Robinson v. State of South Carolina
Appellate Case No: 2020-001361
Lower Court Case No: 2017-CP-23-2653

Dear Ms. Kitchings:

Attached please find the Motion for Extension of Time to File Return to Motion for Appeal Bond in the above-referenced case for filing in your office.

Sincerely,

s/LillianMeadows

LILLIAN L. MEADOWS
Assistant Attorney General
S.C. Bar No. 103665

LLM/
Enclosure

cc: Tara D. Shurling, Esquire (via email only)