

**RECEIVED**  
**Sep 07 2022**  
**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM SPARTANBURG COUNTY  
Court of General Sessions  
R. Kieth Kelly, Circuit Court Judge

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Appellate Case No. 2022-000160

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The State, .....Respondent

v.

Johnathan Olin Batchelor, .....Appellant.

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**Petition to Extend Time**

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Johnathan Batchelor moves this Court for an order extending the time for file the Initial Brief of Appellant and Designation of Matter to be included in the Record on Appeal by thirty days until Thursday, October 6, 2022. This request is based on undersigned counsel's other professional obligations and not intended for delay. From August 15-24, 2022, counsel participated in a three-co-defendant jury trial, in Greenwood County General Sessions Court, in *State v. Dashawn Hurley*, Case No.2020-GS-24-01062-64, 2021-GS-24-01696, & 2022-GS-24-01154, involving allegations of murder, attempted murder, conspiracy, and possession of firearm during the commission of a violent crime. On September 6, 2022, counsel filed the 27-page new trial motion in that case. Today, September 7, 2022, counsel filed a cross-petition for writ of certiorari in *Spade v. State*, Appellate Case No. 2022-000434. Counsel has blocked time to work on this case now that those other filings are compete.

Additionally, undersigned counsel request this Court accept this filing out of time because he overlooked filing this pleading yesterday.

IT IS SO MOVED.

Respectfully Submitted,

By s/E. Charles Grose, Jr.

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*Attorney for Johnathon Batchelor*

October 7, 2022  
Greenwood, South Carolina

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**Certificate of Service**

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I certify that I served this pleading on the State of South Carolina, by email, using counsel's primary email address listed in the Attorney Information System (AIS), as reflected below, on the date reflected below:

William M. Blicht, Jr., Esquire  
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By s/E. Charles Grose, Jr.

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September 7, 2022  
Greenwood, South Carolina

**Subject:** State v. Batchelor, Appellate Case No. 2022-000160  
**Date:** Wednesday, September 7, 2022 at 6:31:55 PM Eastern Daylight Time  
**From:** Charles Grose  
**To:** William Blich  
**Attachments:** 2022 09 07 - Batchelor - Extension Request.pdf

Hope you are well.

Attached plead find Mr. Batchelor's extension request that I am about to file electronically with the SC Court of Appeals, along with a copy of this email.

Thanks, and please let me know if you have any questions.

Best,  
Charles

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