

**RECEIVED**  
**Oct 06 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 for a *final* extension of time to file the Initial Brief of Appellant and Designation of Matter to be included in the Record on Appeal by ten days until Monday, October 17, 2022. From September 22-30, 2022, undersigned counsel was self-quarantined for COVID and working a reduced schedule. Undersigned counsel is first for trial in Greenwood County General Sessions Court, on October 10, 2022, in *State v. Anderson*, Case No. 2016-A24-201-00772, 00773, a first- and second-degree criminal sexual with a minor case. The initial brief is substantially complete, and counsel wants to review the final draft with Mr. Batchelor before filing.

Prior to filing this motion, undersigned counsel attempted to contact counsel for the State without success.

IT IS SO MOVED.

(signature on next page)

Respectfully Submitted,

By s/E. Charles Grose, Jr.

E. Charles Grose, Jr.  
S.C. Bar Number 66063  
The Grose Law Firm, LLC  
404 Main Street  
Greenwood, SC 29646  
(864) 538-4466  
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*Attorney for Johnathon Batchelor*

October 6, 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  
S.C. Attorney General's Office  
PO Box 11549  
Columbia, SC 29211  
[wblitch@scag.gov](mailto:wblitch@scag.gov)

By s/E. Charles Grose, Jr.

E. Charles Grose, Jr.  
The Grose Law Firm, LLC  
404 Main Street  
Greenwood, SC 29646  
(864) 538-4466

October 6, 2022  
Greenwood, South Carolina

**Subject:** Re: Johnathan Batchelor  
**Date:** Thursday, October 6, 2022 at 5:31:15 PM Eastern Daylight Time  
**From:** Charles Grose  
**To:** William Blitch  
**Attachments:** 2022 10 07 - Batchelor - Extension Request.pdf

I'm sorry we were not able to connect today. I understand you might have been out of the office. Attached is the extension request that I am about to file electronically with the SC Court of Appeals, along with a copy of this email.

Thank you for your attention to this matter. Please let me know if you have any questions or require additional information.

Best,  
Charles

E. Charles Grose, Jr.  
The Grose Law Firm, LLC  
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Greenwood, SC 29646  
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Fax: 864-538-4405  
Web: GroseLawFirm.com  
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**From:** Charles Grose <[charles@groselawfirm.com](mailto:charles@groselawfirm.com)>  
**Date:** Thursday, October 6, 2022 at 2:22 PM  
**To:** William Blitch <[wblitch@scag.gov](mailto:wblitch@scag.gov)>  
**Subject:** Johnathan Batchelor

William,

Hope you are well. The initial brief of appellant is due today. I've extended several times. Last week, I was sidelined with COVID, and it looks like I will be first for trial in Greenwood next week. I am hopping you would agree to a final extension until Monday, October 17th. The brief is mostly done, and will want to review the final draft with Mr. Batchelor.

Thank you for your attention to this matter. Please let me know if you have any questions.

Best,  
Charles

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