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SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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S.C. SUPREME COURT

CERTIORARI FROM SUMTER COUNTY

Honorable Edgar W. Dickson, Circuit Court Judge

Case No. 2024-000218

TYRONE JOSEY, ..... Appellant

v.

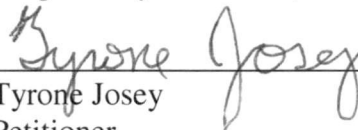
STATE OF SOUTH CAROLINA, ..... Respondent.

PETITIONER'S MOTION FOR ENLARGEMENT OF TIME

COMES NOW, Petitioner, the above-named Petitioner, appearing *Pro Se*, would respectfully move this Honorable Court for an enlargement of time to file his *Pro Se* Response to the Johnson Brief filed by Petitioner's Counsel, which is due to be filed on October 14, 2024. Petitioner received the transmittal letter from the Clerk of Court for the South Carolina Supreme Court on September 4, 2024. Petitioner requests that the time to file its *Pro Se* Response be extended thirty (30) days to November 9, 2024. The Petitioner has not been able to prepare a *Pro Se* Response properly within the allotted time prescribed for the following reasons:

1. Petitioner is currently an inmate within the South Carolina Department of Corrections at the Correctional Facility of Turbeville Correctional Institution in Turbeville, South Carolina, pursuant to Orders of Commitment by the Sumter County Clerk of Court.
2. Petitioner has not been able to utilize the Institutional Law Library due to his lack of access to the Institutional Law Library as the Law Library has been open as required by Agency Policy/Procedure in accordance with Bounds v. Smith, 430 U.S. 817, 97 S.Ct. 1491, 52 L.Ed.2d 72 (1977) and Lewis v. Casey, 518 U.S. 343, 116 S.Ct. 2174, 135 L.Ed.2d 606 (1996) and believes that an enlargement of time would allow him to properly prepare a *Pro Se* Response.
3. Petitioner has not been able, in a timely fashion, to prepare necessary copies, gather pertinent information and/or documentation, or conduct adequate research in order to prepare a proper *Pro Se* Response within the allotted time prescribed.
4. There has been no prior extension requested by the Plaintiff in this case.

Respectfully Submitted,



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Tyrone Josey  
Petitioner

S.C.D.C. No. 00355699  
Turbeville Correctional Institution  
Elliott Unit, B-Side, Cell 0184  
1578 Clarence Coker Highway  
Turbeville, South Carolina 29162

**PETITIONER, *Pro Se***

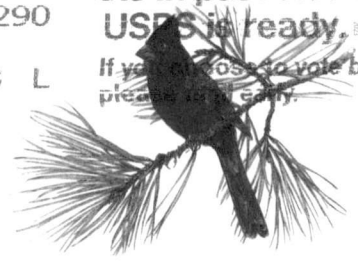
October 9, 2024.  
Turbeville, South Carolina.

TyVone Josey, #355099  
Tombauville CD, EB184  
1578 Clarence Collier Highway  
Tombauville, SC 29162

COLUMBIA SC 290

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Honorable Jerry A. Hitchings  
SC Court of Appeals, Clerk  
Office of the Clerk of Court  
Post Office Box 11629  
Columbia, SC 29211

25211-162929



THE DEPARTMENT OF CORRECTIONS HAS NOT  
INSURED NOR INSPECTED THIS ITEM. THEREFORE  
THE DEPARTMENT DOES NOT ASSUME RESPONSIBILITY  
OR ITS CONTENTS.

TURBEVILLE CORRECTIONAL INSTITUTION  
S. C. DEPARTMENT OF CORRECTIONS



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