

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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**RECEIVED**

**Dec 18 2024**

APPEAL FROM LEXINGTON COUNTY  
Court of Common Pleas  
Edward W. Miller, Circuit Court Judge

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**S.C. SUPREME COURT**

Appellate Case No. 2024-000979

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Thomas Stafford,.....Petitioner,

v.

State of South Carolina, .....Respondent.

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**Petition to Extend Time**

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Thomas Stafford moves this Court for an order extending the time to file the appendix and petition for a writ of certiorari by 30 days until Friday, January, 17 2025. This is the third request for an extension to file this pleading. This request is based on undersigned counsel's other professional obligations and is not intended for delay.

Counsel is a sole practitioner with a statewide trial, appellate, and post-conviction practice. In addition to multiple court appearances in multiple counties, counsel has been working on other appellate obligations. In *State v. Dent*, Appellate Case No. 2024-000355, pursuant to this Court's expedited procedure for appeals from the Court of Appeals, counsel filed the Brief of Petitioner on December 2, 2024 and the Reply Brief of Petitioner December 16, 2024. On December 16, 2024, Counsel filed the Record on Appeal in *State v. Lee*, Appellate Case No. 2023-001843. Counsel is working on the final briefs in *State v.*

*Lee* and a petition for a writ of certiorari in *Gregory v. State*, Appellate Case No. 2024-000848.

Additionally, in this case, the parties have learned the PCR hearing exhibits are not available and have been working on an agreement for the exhibits to be included in the Appendix.

Between December 23, 2024 and January 3, 2025, counsel plans to devote significant time to this pleading in order to complete the petition for writ of certiorari without need for additional extensions.

Prior to filing this motion, undersigned counsel consulted with counsel for the State, who does not oppose this request.

IT IS MOVED.

By *s/E. Charles Grose, Jr.*

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December 18, 2024.  
Greenwood, South Carolina