

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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**RECEIVED**

**Jan 17 2025**

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 Monday, February 17, 2025. 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 and trial court pleadings including: an Initial Reply Brief of Appellant on January 13, 2025, in *State v. Hudson*, Appellate Case No. 2024-000439 and a Post-Evidentiary Reply Brief on January 15, 2025, in *Blackwell v. State*, Case No. 2018-CP-432-00928, a capital PCR case. Counsel is working on an Initial Brief of Appellant in *State v. Bishop*, Appellate Case No. 2024-001476, a petition for writ of certiorari in *Gregory v. State*, Appellate Case No. 2024-000848, a post hearing brief in *Stone v. State*,

Case No. 2018-CP-43-01025 (a capital PCR case), and a petition for writ of certiorari in the Supreme Court of the United States regarding the opinion in *Stanko v. Stirling*, 109 F.4th 681 (4th Cir. 2024).

Counsel is working on this pleading, will devote time to it over the upcoming holiday weekend, and anticipates completing by the end of next week, without need for additional extensions.

IT IS MOVED.

By s/E. Charles Grose, Jr.

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January 17, 2024  
Greenwood, South Carolina