

STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM EDGEFIELD COUNTY
Court of Common Pleas
Edgar W. Dickson, Circuit Court Judge

Appellate Case No. 2014-000591
Lower Court Case No. 2012-CP-19-0304

RECEIVED

JAN 09 2015

S.C. SUPREME COURT

FREDY DELEON, #304977,

RESPONDENT-PETITIONER,

v.

STATE OF SOUTH CAROLINA,

PETITIONER-RESPONDENT.

RESPONDENT-PETITIONER'S MOTION FOR EXTENSION OF TIME

THIS MATTER comes before the Court by way of an appeal from a Post-Conviction Relief Order. The Respondent-Petitioner's Petition for Writ of Certiorari and Return to the Petitioner-Respondent's Petition for Writ of Certiorari are both due for filing on January 12, 2015. Because of my heavy State and federal trial and appellate schedule, I will be unable to complete these documents by that date and, for that reason, I now respectfully request a 30-day extension of time in which to prepare and submit my Petition for Writ of Certiorari and the Return to the Petitioner-Respondent's Petition for Writ of Certiorari on behalf of this client. I

have contacted opposing counsel, J. Walt Whitmire, Assistant Attorney General, regarding this matter, and he consents to the extension request.¹

Respectfully submitted,



JEREMY A. THOMPSON
Attorney and Counselor at Law

Law Office of Jeremy A. Thompson, LLC
P.O. Box 12891
Columbia, SC 29211
803-779-2555
803-779-2556 FAX
jeremyatlaw@yahoo.com

**ATTORNEY FOR RESPONDENT-
PETITIONER.**

This 8th day of January, 2015.

¹ Inasmuch as counsel for the Petitioner is a sole practitioner, he has not obtained any additional signatures to this motion. See In re Extension Requests in Criminal Direct Appeals and Post-Conviction Relief Certiorari Proceedings, S.C. Sup. Ct. Order filed March 18, 2009.

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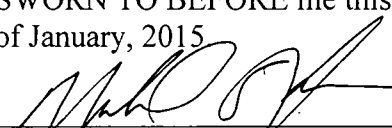
CERTIFICATE OF SERVICE

The undersigned hereby certifies that one copy of the Respondent-Petitioner's Motion for Extension of Time in the above-entitled case has been served upon opposing counsel, J. Walt Whitmire, Assistant Attorney General, Office of the Attorney General, P.O. Box 11549, Columbia, SC 29211, by depositing in the U.S. mail with proper postage, this 8th day of January, 2015.



JEREMY A. THOMPSON
ATTORNEY FOR RESPONDENT-PETITIONER

SWORN TO BEFORE me this 8th day
of January, 2015



Notary Public for South Carolina

(L.S.)

My Commission Expires:

7/16/2022



LAW OFFICE OF
JEREMY A. THOMPSON
LLC

January 8, 2015

RECEIVED

JAN 09 2015

S.C. SUPREME COURT

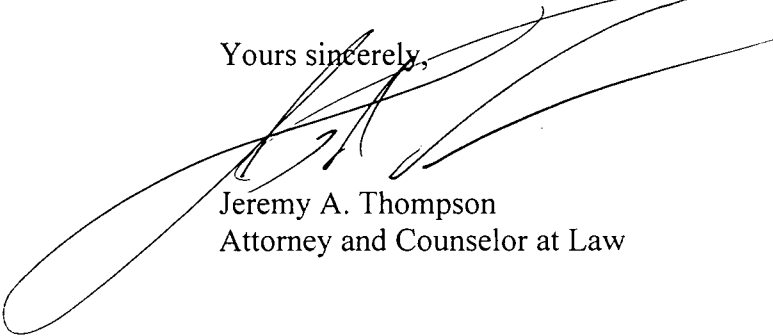
The Honorable Daniel E. Shearouse
Clerk, Supreme Court of South Carolina
P.O. Box 11330
Columbia, SC 29211-1330

RE: Fredy DeLeon, #304977 v. State of South Carolina; 2012-CP-19-304
Appellate Case Number: 2014-000591

Dear Mr. Shearouse:

Enclosed please find the original and one copy of my motion for extension of time in the above-captioned matter. I would appreciate your filing the original motion, clocking the copy, and returning the remaining copy to me in the enclosed self-addressed, stamped envelope. If I can be of any further assistance to the Court in this matter, please do not hesitate to contact me. With my thanks for the Court's assistance in this matter, and my best regards, I am,

Yours sincerely,


Jeremy A. Thompson
Attorney and Counselor at Law

JAT/

Enclosures

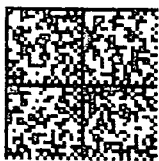
cc: J. Walt Whitmire, Assistant Attorney General (w/ enclosure)
Fredy DeLeon, #304977 (w/ enclosure)
Teresa Tamayo (w/ enclosure)



LAW OFFICE OF
JEREMY A. THOMPSON
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P.O. Box 12891, Columbia, SC 29211

The Honorable Daniel E. Shearouse
Clerk, Supreme Court of South Carolina
P.O. Box 11330
Columbia, SC 29211-1330



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