

THE STATE OF SOUTH CAROLINA
In The Supreme Court

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S.C. Supreme Court

APPEAL FROM GREENWOOD COUNTY

Donald B. Hocker, Circuit Court Judge

Appellate Case Number: 2014-002721

Edward Dean and Nolan Brown

Appellants

v.

Mark Keel in his official capacity as
Chief of the South Carolina Law
Enforcement Division

Respondent

Petition to Extend Time

Counsel for the appellants respectfully petitions this Court for an additional 30 days to file his initial brief of appellant. Pursuant to the South Carolina Supreme Court's order number 2009-03-18-01, this petition is the first request for an extension. In support of this petition, counsel shows:


Because of other professional obligations, counsel has not had sufficient time to complete the brief consistent with their duty to provide effective assistance of counsel. On January 15, 2015, counsel argued *John Hughey v. State* before this Court, which is an appeal in a capital PCR case. On January 26, 2015, counsel is scheduled to begin a jury trial in *State v. Michael Beaty*, a Laurens County murder charge.

Counsel makes this request in good faith and not for purposes of delay.

Counsel, therefore, respectfully requests a 30-day extension to Friday, February 20, 2015 in which to file the appellants' initial brief.

IT IS SO MOVED.

Respectfully Submitted,

By 

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

Attorney for Appellants

January 21, 2015
Greenwood, South Carolina

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Certificate of Service

I certify that I have served the Petition to Extend Time on the Respondent, by placing a copy in the United States Mail, postage prepaid, on the date reflected below, addressed as follows:

Courtney E. Lowell, Esquire
Office of the Attorney General
P.O. Box 11549
Columbia, SC 29211



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January 21, 2015
Greenwood, South Carolina