

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM GREENWOOD COUNTY

Donald B. Hocker, Circuit Court Judge

Appellate Case Number: 2014-002721

RECEIVED

FEB 26 2015

S.C. Supreme Court

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 &
To Except this Petition Out of 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 second 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. From January 26 to 30, 2015, counsel was involved in a jury trial in *State v. Michael Beaty*, a Laurens County murder charge. Counsel has also

been preparing for the jury trial of State v. Russell Prince, an Abbeville County first-degree criminal sexual conduct with a minor trial, that begins February 23, 2015.

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

Counsel, therefore, respectfully requests a 30-day extension to Monday, March 23, 2015 in which to file the appellants' initial brief.

Counsel also petitions this Court to accept the petition to extend time outside of the ordinary time limits. The previous deadline was Friday, February 20, 2015. Counsel was involved in depositions on that date. On Saturday, February 21, 2015, counsel realized he inadvertently overlooked filing this request on or before February 20, 2015.

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

February 23, 2015
Greenwood, South Carolina

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM GREENWOOD COUNTY

Donald B. Hocker, Circuit Court Judge

Appellate Case Number: 2014-002721

Edward Dean and Nolan Brown

Appellants

v.

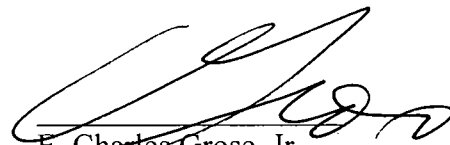
Mark Keel in his official capacity as
Chief of the South Carolina Law
Enforcement Division

Respondent

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



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

February 23, 2015
Greenwood, South Carolina