

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

APPEAL FROM GREENWOOD COUNTY  
Court of Common Pleas

The Honorable Clifton Newman, Circuit Court Judge

Case No. 2010-CP-24-0259

**RECEIVED**

MAR 26 2015

**S.C. Supreme Court**

CHARLES N. VANDROSS.....Petitioner,  
v.  
STATE OF SOUTH CAROLINA..... Respondent.

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SECOND MOTION FOR EXTENSION OF TIME  
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The undersigned counsel respectfully request a thirty-day (30) extension of time in which to file the Brief of Petitioner and Appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following exigent circumstances:

1. The Brief of Petitioner and the Appendix in this case are due to be filed today.
2. Counsel for the Petitioner, Elizabeth Franklin-Best has been busy preparing for the continuation of a capital hearing in the matter of *Quincy Allen v. State of South Carolina*. Counsel E. Charles Grose, Jr. had an extraordinarily busy first quarter of 2015. On January 15, 2015, he 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. He prepared for the jury trial of *State v. Russell Prince*, an Abbeville County first-degree criminal sexual conduct with a minor trial, and appeared in court for pre-trial hearings from February 23 to 25, 2015, before that case was continued because of the

possibility of bad weather. On March 4, 5, and 13, 2015, he participated in the *Atkins* Hearing in *State v. Bennie Brown*, a Laurens County capital trial case.

3. Undersigned counsel has spoken with counsel for respondent, Rutledge Johnson, and he has no objection to this request for an extension of time.

WHEREFORE, the undersigned counsel respectfully request a thirty-day extension of time in which to file the Brief of Petitioner and the Appendix in this case.

Respectfully Submitted.

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BY:   
Counsel for Petitioner

March 23, 2015

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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APPEAL FROM GREENWOOD COUNTY  
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Case No. 2010-CP-24-0259

CHARLES N. VANDROSS.....Applicant,  
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CERTIFICATE OF SERVICE

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I, Jill Rider, hereby certify that I have served upon the attorney for the Respondent one (1) copy of Applicant's Motion for Extension of Time in the above-captioned case by depositing a copy of same in the United States Mail, first class, postage pre-paid, addressed as follows:

Rutledge Johnson  
Office of the Attorney General  
P.O. Box 11549  
Columbia, SC 29211-1549

This the 23<sup>rd</sup> day of March, 2015, in Columbia, South Carolina.

  
JILL RIDER