

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas
Post-Conviction Relief

Edgar W. Dickson, Circuit Court Judge

Appellate Case No.: 2014-001640

Bobby Russell, Jr.,..... Appellant,

vs.

State of South Carolina,Respondent.

CONSENT MOTION FOR EXTENSION

Comes now, Tommy A. Thomas, Counsel for Appellant, with the consent of Megan Harrigan Jameson, Counsel for Respondent, respectfully requesting an extension of time to file the Petition for Writ of Certiorari and Appendix in the above referenced matter.

Counsel is requesting this extension due his heavy caseload. There have been a number of matters which have required immediate attention.

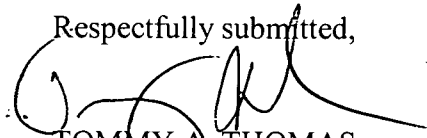
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APR 15 2015

S.C. Supreme Court

The Attorney for Appellant respectfully requests the Court grant an extension of time of thirty (30) days, in which to file its Petition for Writ of Certiorari and Appendix.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Tommy A. Thomas', written over the typed name.

TOMMY A. THOMAS

P.O. Box 88

Irmo, SC 29063

(803) 732-5507

Megan Harrigan Jameson, Esq.
Assistant Attorney General
P.O. Box 11549
Columbia, SC 29211
Attorney for Respondent

Irmo, South Carolina
April 14, 2015

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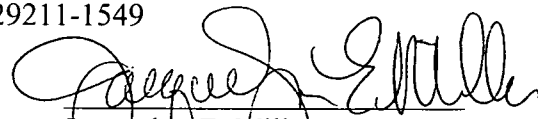
Bobby Russell, Jr, Appellant,
vs.

State of South Carolina, Respondent.

CERTIFICATE OF SERVICE

I, Jacquelyn E. Miller, secretary to Tommy A. Thomas, Attorney for the Appellant hereby certify that I placed in the United States Mail, a copy of a Consent Motion for Extension, with postage prepaid and the return address clearly shown on said envelope to Megan Harrigan Jameson, Esq. of the Attorney General's Office, at:

Megan Harrigan Jameson, Esq.
Attorney General's Office
P.O. Box 11549
Columbia, SC 29211-1549



Jacquelyn E. Miller
Secretary to Tommy A. Thomas
Attorney for Appellant
P.O. Box 88
Irmo, SC 29063
(803) 732-5507

Irmo, SC
April 14, 2015

Tommy A. Thomas

ATTORNEY AND COUNSELOR AT LAW

TELEPHONE:
(803) 732-5507
(803) 732-5508

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S.C. Supreme Court

PLEASE REPLY TO:
PO BOX 88
IRMO, SC 29063

INMATE LINE
(803) 732-6342

April 14, 2015

The South Carolina Supreme Court
Clerk, Daniel Shearouse
P.O. Box 11330
Columbia, SC 29211

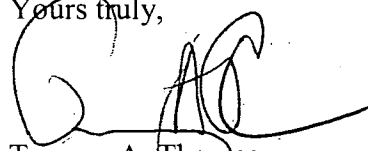
RE: Bobby Russell, Jr. v. State of South Carolina
Appellate Case No.: 2014-001640

Dear Sir or Madam:

Enclosed please find an original and a copy of a Consent Motion for Extension to be filed in the above matter.

Please return a clocked copy to me in the enclosed envelope. I appreciate your consideration in this matter. Should you have any questions, or need any additional information, please do not hesitate to contact me.

Yours truly,

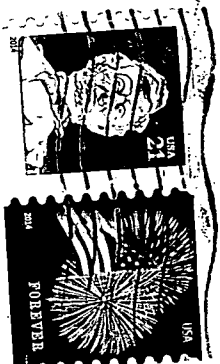
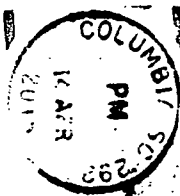


Tommy A. Thomas,
Attorney at Law

TAT/jem
cc: Megan Harrigan Jameson, Esq.

Tommy A. Thomas, P.C.
ATTORNEY AND COUNSELOR AT LAW
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