

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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

Edgar W. Dickson, Circuit Court Judge

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Appellate Case No.: 2014-001640

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

vs.

State of South Carolina, .....Respondent.

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CONSENT MOTION FOR EXTENSION

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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.

This extension request is not intended for the purpose of delay. Rather, this extension request is necessitated by a heavy workload and is for good cause.

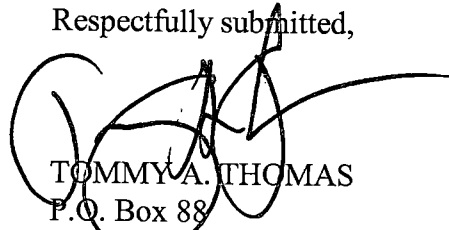
RECEIVED

MAY 18 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', is written over the typed name and address. The signature is stylized and somewhat illegible due to overlapping loops and a long horizontal stroke extending to the right.

TOMMY A. THOMAS

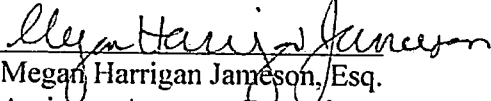
P.O. Box 88

Irmo, SC 29063

(803) 732-5507

May 14, 2015

I consent

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

Irmo, South Carolina  
May 14, 2015

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Bobby Russell, Jr, ..... Appellant,  
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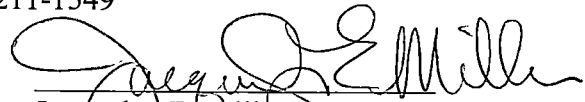
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CERTIFICATE OF SERVICE

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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  
May 14, 2015

**Tommy A. Thomas**

**ATTORNEY AND COUNSELOR AT LAW**

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

**HARRINGTON BUILDING**  
**7588 WOODROW STREET**  
**IRMO, SOUTH CAROLINA 29063**

**PLEASE REPLY TO:**  
**PO Box 88**  
**IRMO, SC 29063**

**FACSIMILE:**  
**(803) 781-4226**

**INMATE LINE**  
**(803) 732-6542**

May 14, 2015

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MAY 16 2015

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

**S.C. Supreme Court**

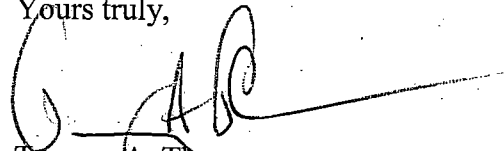
RE: Bobby Russell, Jr. v. State  
Case No.: 2014-001640

Dear Sir or Madam:

Enclosed please find for filing an original and a copy of a Consent Motion for Extension of time to file the Petitioner for Writ of Certiorari and Appendix along with a Certificate of Service.

Kindly return a clocked copy to me in the enclosed envelope. Thank you and should you have any questions, please feel free to contact me.

Yours truly,



Tommy A. Thomas,  
Attorney at Law

cc: Megan E. Harrigan Jameson, Esq.

Tommy A. Thomas, P.C.  
ATTORNEY AND COUNSELOR AT LAW  
HARRINGTON BUILDING  
POST OFFICE BOX 88  
IRMO, SOUTH CAROLINA 29063

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

