

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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**RECEIVED**

JUN 29 2015

APPEAL FROM GREENWOOD COUNTY

Donald B. Hocker, Circuit Court Judge

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**S.C. SUPREME COURT**

Appellate Case Number: 2014-002721

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Edward Dean and Nolan Brown

Appellants

v.

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

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Respondent

Petition to Extend Time &  
To Except this Petition Out of Time

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Counsel petitions this Court to extend time to serve the Record on Appeal and file the Certificate of Service with this Court. From June 15-19, 2015, counsel was involved in the jury trial of *State v. Russell Prince*, Abbeville County Indictment Numbers 2015-GS-01-200, 203 and 204 for first-degree criminal sexual conduct with a minor and two counts of third-degree criminal sexual conduct with a minor.

Counsel also petitions this Court to accept the petition to extend time outside of the ordinary time limits. The previous deadline was Monday, June 22, 2015. Following the weeklong trial, counsel regrettably overlooked this filing deadline. As evidenced by the attached exchange of emails, counsel for the Respondent does not object to this request.

Counsel requests an extension to Monday, June 29, 2015. Counsel provided an electronic copy of the Record on Appeal to opposing counsel on June 25, 2015 and had hoped to mail a printed copy the same day. The record is at the printers for copying and binding. Counsel will sever the Record as soon as it is received from the printer.

Counsel apologizes to the Court, its staff, and opposing counsel for any inconvenience resulting from this oversight.

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*

June 25, 2015  
Greenwood, South Carolina

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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Donald B. Hocker, Circuit Court Judge

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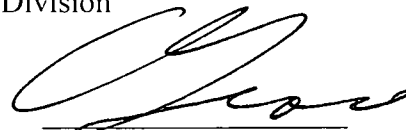
Certificate of Service

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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

Adam L. Whitsett, Esquire  
General Counsel  
South Carolina Law Enforcement Division  
PO Box 21398  
Columbia, SC 29221



E. Charles Grose, Jr.  
The Grose Law Firm, LLC  
404 Main Street  
Greenwood, SC 29646

June 25, 2015  
Greenwood, South Carolina

**Subject:** RE: Dean & Brown v Keel

**Date:** Thursday, June 25, 2015 at 9:35:14 AM Eastern Daylight Time

**From:** Courtney Lowell

**To:** Charles Grose

**CC:** Whitsett, Adam

Good morning Charles,

We don't object to you petitioning the Court to serve the Record out of time. Could you possibly try resending the attachment, but in multiple e-mails?

Best,  
Courtney

**Courtney E. Lowell**

Assistant Attorney General  
Office of the Attorney General  
State of South Carolina

Post Office Box 11549  
Columbia, South Carolina 29211  
Phone: 803.734.3177  
Fax: 803.734.3677  
E-mail: [clowell@scag.gov](mailto:clowell@scag.gov)

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**From:** Charles Grose [<mailto:charles@groselawfirm.com>]  
**Sent:** Thursday, June 25, 2015 8:59 AM  
**To:** Courtney Lowell; Whitsett, Adam  
**Subject:** Re: Dean & Brown v Keel

Please see below. I tried to send this email, but it was rejected because of the size of the attachment.

Best,  
Charles

E. Charles Grose, Jr.  
The Grose Law Firm, LLC  
404 Main Street  
Greenwood, SC 29646  
Phone: 864-538-4466  
Fax: 864-538-4405  
Web: [GroseLawFirm.com](http://GroseLawFirm.com)  
Email: [charles@groselawfirm.com](mailto:charles@groselawfirm.com)

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**From:** Charles Grose <[charles@groselawfirm.com](mailto:charles@groselawfirm.com)>  
**Date:** Thursday, June 25, 2015 at 8:43 AM  
**To:** Courtney Lowell <[CLowell@scag.gov](mailto:CLowell@scag.gov)>, "Whitsett, Adam" <[awhitsett@sled.sc.gov](mailto:awhitsett@sled.sc.gov)>  
**Subject:** Dean & Brown v Keel

Courtney and Adam,

I goofed up and didn't get the Record on Appeal prepared before the deadline. An electronic copy is attached. I will serve a paper copy today by mail.

I will also petition the Court to serve the Record out of time. I would like to have your consent to this request. Please let me know if this is something you can consent to.

I apologize for any inconvenience this has caused.

Best,  
Charles

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