

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM PICKENS COUNTY

D. Garrison Hill, Circuit Court Judge

Appellate Case Number: 2015-000351

RECEIVED

SEP 24 2015

S.C. Supreme Court

The State

Respondent,

v.

Donna Lynn Phillips,

Petitioner.

Amended Petition for Extension of Time to File Reply Brief

The petitioner, Donna Lynn Phillips, petitions this Court for an extension of time to file her reply brief, which is due on Monday, September 21, 2015. This is the first request—and will be the only request—for an extension to file this brief.

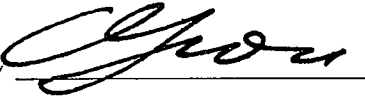
This appeal challenges the trial court's denial of Ms. Phillips directed verdict motion. Both parties have substantially updated their arguments since the opinion in the Court of Appeals. Ms. Phillips is serving a twenty-five year sentence, which is effectively a life sentence based on her medical condition. Counsel has been conferring with Ms. Phillips and her family about matters to include in the reply brief. Counsel believes that another ten days will allow for adequate briefing.

Counsel believes good cause exists for this request, and it is not intended for delay. This Court's staff recently requested counsel save December 1, 2, and 3, 2015 for

the oral argument in this case. This request should not interfere with convening the argument in December.

Ms. Phillips, therefore, respectfully requests an extension of ten days, to Thursday, October 1, 2015, to file her reply brief.

IT IS SO MOVED.

By 

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

Attorney for Petitioner

September 24, 2015
Greenwood, South Carolina

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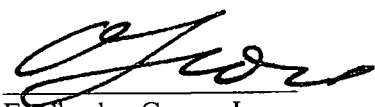
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Amended Petition for Extension of Time to File Reply Brief

Certificate of Service

I certify that I have served the Amended Petition for Extension of Time to File Reply Brief, by placing a copy in the United States Mail, postage prepaid, on the date reflected below, addressed as follows:

J. Benjamin Aplin, 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

September 24, 2015
Greenwood, South Carolina

The Grose Law Firm, LLC

404 Main Street, Greenwood, South Carolina 29646

E. Charles Grose, Jr.
Phone: 864-538-4466 Fax: 864-538-4405
E-mail: chasgrose@gmail.com
Web: GroseLawFirm.com

September 21, 2015

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

RECEIVED

SEP 24 2015

S.C. Supreme Court

Re: *State v. Donna Lynn Phillips*
Supreme Court Appellate Case Number 2015-000351

Dear Mr. Shearouse:


Enclosed please the original and six copies of Ms. Phillips amended petition for an extension of time to file her reply brief.

By copy of this letter to Mr. Aplin, I am serving a copy on the State of South Carolina.

Thank you for your attention to this matter. If you have any questions or require additional information, please do not hesitate to contact me.

With kindest regards, I am

Yours very truly,



E. Charles Grose, Jr.

cc: J. Benjamin Aplin, Esquire

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SEP 29 2015

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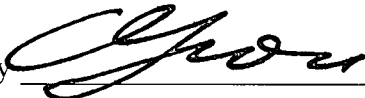
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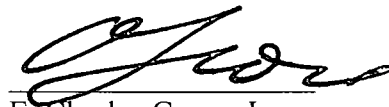
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E. Charles Grose, Jr.

Phone: 864-538-4466 Fax: 864-538-4405

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