

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

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S.C. SUPREME COURT

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

MOTION FOR EXTENSION OF TIME

The undersigned counsel respectfully request a thirty-day (30) extension of time in which to file the petition for writ of certiorari 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 and Charles Grose have been preparing for an evidentiary hearing in a state capital case, *William Oliver Dickerson v. State of South Carolina*, 2012-CP-10-3216, that is currently scheduled for December 7, 2015. Counsel are having to litigate issues that have arisen after the Ninth Circuit Solicitors Office disclosed an additional 4 boxes of materials in October (and made an additional claim of privilege over another 1000 pages of juror selection notes). A hearing on those issues is scheduled for November 20, 2015.

3. Additionally, counsel Elizabeth Franklin-Best filed objections to a report and recommendation in a federal case, *Avery v. McCall-Tanner*, C/A No. 9:14-cv-00037-DCN on Monday, November 9, 2015; a traverse in a federal habeas matter, *Anthony Mann v. Reynolds*, 0:15-cv-00163-RMG-PJG on Monday, November 2, 2015, and has another traverse in a federal habeas matter, *Bolin v. Stirling*, 4:15-cv-1523-DCN-TER due this Friday, November 13, 2015. Counsel does not have any additional pleadings due in federal court at this time so her calendar is largely clear going forward.


4. Counsel Charles Grose also is briefing matters in two cases currently in the Court of Appeals, *State v. Michael Beatty, Jr.*, and *State v. Preston Shands, Jr.*

WHEREFORE, the undersigned counsel respectfully request a thirty-day extension of time in which to file the petition for writ of certiorari and the Appendix in this case.

Respectfully Submitted.

ELIZABETH FRANKLIN-BEST
SC Bar No. 72555
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(803)765-1044

E. CHARLES GROSE, JR.
The Grose Law Firm
404 Main Street
Greenwood, SC 29646
(864)992-3433

BY: 
Counsel for Petitioner

November 9, 2015.

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM GREENWOOD COUNTY
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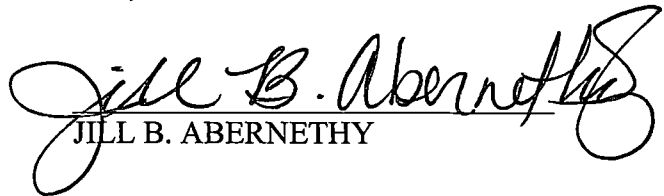
CHARLES N. VANDROSS..... Petitioner,
v.
STATE OF SOUTH CAROLINA..... Respondent.

CERTIFICATE OF SERVICE

I, Jill Abernethy, hereby certify that I have served upon the attorney for the Respondent one (1) copy of Petitioner'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 9th day of November, 2015, in Columbia, South Carolina.


JILL B. ABERNETHY

BLUME NORRIS & FRANKLIN-BEST, LLC

ATTORNEYS AT LAW

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November 9, 2015

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

S.C. SUPREME COURT

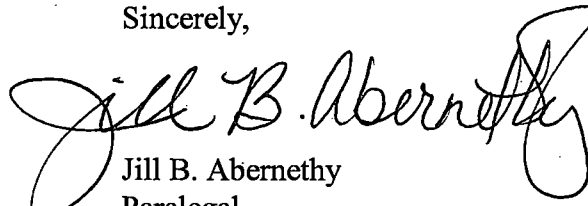
RE: *Charles N. Vandross v. State of South Carolina*

Dear Mr. Shearouse:

Please find enclosed for filing, with certificate of service, the original and seven copies of Petitioner's Motion for Extension of Time. Please clock in the extra copy and return it to me in the enclosed self-addressed stamped envelope.

If you should have any questions, please do not hesitate to contact me.

Sincerely,


Jill B. Abernethy
Paralegal

cc: Rutledge Johnson, Esq.
Charles Grose, Esq.

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