

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM GREENWOOD COUNTY
Court of Common Pleas

RECEIVED

DEC 10 2015

The Honorable Clifton Newman, Circuit Court Judge

Case No. 2010-CP-24-0259

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 Petition for Writ of Certiorari and the Appendix in this case are due to be filed today.
2. Counsel for the Petitioner, Elizabeth Franklin-Best and Charles Grose concluded the evidentiary hearing in a state capital case, *William Oliver Dickerson v. State of South Carolina*, 2012-CP-10-3216, that was held on December 7th and 8th, 2015 in Richland County before the Honorable G. Thomas Cooper, Jr.. Preparing for this hearing was particularly labor-intensive due to the use of experts who testified to lead poisoning and neurological deficits as the result of childhood exposure to lead.

3. Counsel do not have briefing or trials in any other cases for the next month, and will prioritize this case to have this appeal filed as quickly as possible.

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,

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BY: 

Counsel for Petitioner

December 9, 2015.

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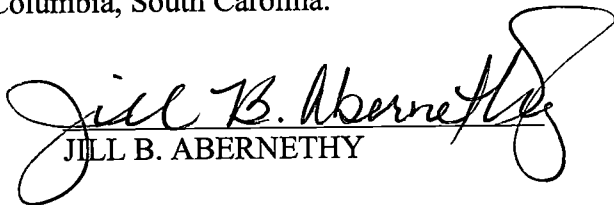
CHARLES N. VANDROSS..... Petitioner,
v.
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CERTIFICATE OF SERVICE

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 December, 2015, in Columbia, South Carolina.


JILL B. ABERNETHY