

December 3, 2015

Russell Dawson, #161707
Lieber Corr, Inst,
P.O. Box 205
Ridgeville, SC 29472

The Supreme Court of South Carolina
Daniel E. Shearouse, Clerk of Court
Post Office Box 11330
Columbia, South Carolina 29211

RE: Russell Dawson v. State
Applicant Case No: 2015-002368
Lower Court Case No: 2013-CP-1601063

"Motion for 60 Days Extension"
IN The Above Case No: 2015-002368

Dear Mr. Shearouse:

I ~~need~~ ^{need} MY Attorney Jessica Elizabeth Kinard more
Time to provide this ~~Supreme~~ ^{Supreme} Court ^{with} A written explanation
as to why this determination was improper. I also need time
to talk to my Attorney about the serious matters IN MY
CASE. I wasn't told BY this ~~Supreme~~ ^{Supreme} Court that AN Attorney
was appointed to me, therefore I have never received
A legal letter from Ms. Kinard saying that she was
~~appointed~~ appointed BY the ~~Supreme~~ ^{Supreme} Court to assist me
IN MY appeal. ~~Applicant~~ ^{Applicant} want ~~the~~ ^{the} Supreme Court of
South Carolina to know that the Lower Court of Common Pleas
of Darlington County ~~was~~ ^{was} improper, Applicant showed proof
IN HIS PCR petitions and motions that his 14th Amendment cons-
titutional rights was violated BY the trial court, ^{by the state} and state.
THIS Supreme Court should grant me and my Attorney more extended
time to file my appeal, because my Attorney Ms. Kinard don't know
~~the~~ the facts IN my case, to ^{file} file AN appeal on my behalf,

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S.C. SUPREME COURT
December 3, 2015

Russell Dawson, #161707
Lieber Correctional Institution
P.O. Box 205
Ridgeville, SC 29472

The Supreme Court of South Carolina
Daniel E. Shearouse, Clerk of Court
Post Office Box 11330
Columbia, South Carolina 29211

RE: Russell Dawson v. State
Applicant Case No: 2015-002368
Lower Court Case No: 2013-CF-1601003

"motion for 60 days"
~~petition~~ Exhibition
IN the above case No:
2015-002368

Dear Mr. Shearouse:

Applicant is asking this Supreme Court for ^{A 60 DAYS} ~~60~~ EXHIBITION, so that he can discuss his appeal with his attorney. He has never ~~talked~~ talk to his attorney MS. Jessica Elizabeth Kinard about the facts in his case, and appeal. Therefore he and his attorney need ~~more~~ more than (20) days to disclose the serious constitutional rights violation that cause this wrongful conviction, and show why the lower court was improper ^{in his per petition.}

The state knew that they did not have "subject matter jurisdiction" to try applicant in the 2 counts of armed robbery indictments, because there wasn't no South Carolina code of Law statute in the body of the indictments, the lower courts seen this gross constitutional rights violation and fail to correct this wrongful conviction, the grand jury can not true bill an indictment if there is no code of Law statute in the indictment, this above is proof that the ~~indictment~~ armed robbery indictments wasn't a valid legal document. This legal letter contain sufficient facts, argument and citation to legal authority to show that there is an arguable basis for asserting that the determination by the lower court was improper. The applicant has made and sufficient showing and ask that his wrongful conviction be vacated by this Supreme Court, very truly yours,
Russell Dawson

The Supreme Court of South Carolina
Daniel E. Shearouse, Clerk of Court

December 3, 2015

The Supreme Court will be denying me due process of Law in this above case IF they don't Grant Applicant 60 Days Exhition motion, I need to talk to my Attorney

FACTS (1) The State knew that Applicant wasn't indicted

~~legally~~ Legally in the 2 counts of armed Robbery Indictments. The Grand Jury true bill the Armed Robbery Indictments knowing that there wasn't no South Carolina Code of Law statute in the Body of the Indictments

This above is proof that the state did not have "Subject matter Jurisdiction" to try ~~me~~ Applicant in the ~~invalid~~ Invalid Indictments. This is also grounds to have ~~me~~ Applicant wrongfully conviction vacated.

The State had also tried Applicant 2 time for the same offense which cause^A Double jeopardy violation.

Before
this Court
order
can be
revoked

Applicant ASK this ~~Supreme~~ Supreme Court for 60 Days ~~Exhition~~ Exhition that he can discuss his case with his Attorney and give her all the FACTS, and provide legal documents to prove his claims of serious constitutional rights violation, ~~Supreme~~ this Court gave Applicant Attorney (20) Days to show that there is an arguable basis for asserting that the determination by the Lower Court was improper. The Applicant has made a sufficient showing that the Lower Court was improper, Review ~~Illegal~~ Indictments for more proof of serious constitutional rights violations, Applicant pray that the Supreme Court of South Carolina ~~judges~~ will Grant this 60 Days Exhition motion. and ~~vacat~~ VACAT his wrongfully conviction.

Very truly yours,
Russell Dawson

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P.S. Please send me my Attorney Address so that I can write to her about my appeal, my case. Thank you. Russell Dawson

MR. RUSSELL DAWSON #161787

LIEBER CORRECTIONAL INSTITUTION

P.O. BOX 205

RODBEVILLE, SC 29472

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The Supreme Court of South Carolina
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COLUMBIA, SOUTH CAROLINA 29211

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S.C. DEPARTMENT OF CORRECTIONS

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