

1st AFB due 12/31/15

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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM KERSHAW COUNTY
Court of General Sessions
Doyet A. Early, III, Circuit Court Judge

RECEIVED

JAN 04 2016

SC Court of Appeals

Court of Appeals Case No. 2015-001436

The State, Respondent

v.

Nakia Johnson, Appellant.

**Petition for Extension of Time to File Initial Brief
and Designation of Matter to be Included in Record on Appeal**

The appellant, Nakia Johnson, petitions this Court for an order extending the time to file his initial brief and designation of matter to be included in the Record on Appeal for thirty days until Monday, February 1, 2016. This petition is the first request for an extension. This request is based on the following grounds:

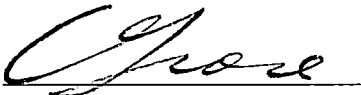
1) Counsel had a very busy December 2015. Counsel had an oral argument in the South Carolina Supreme Court on December 3, 2015. *State v. Donna Lynn Phillips*. Counsel is involved in a number of capital cases including William O. Dickerson, Jr. (a capital PCR) that had an evidentiary hearing scheduled to commence on October 19, 2015 but, based on the unprecedented weather and other matters in the case, was continued to December 7, 2015. Preparation of this hearing required a substantial amount of counsel's time. Counsel has also been working on initial briefs, in *State v.*

Michael Beatty, Jr. and *State v. Preston Shands, Jr.*, both of which involve sentences of life imprisonment without the possibility of parole.

5) This request is made in good faith and is not intended for delay. Counsel believes good cause exists for this extension request.

Ms. Johnson, therefore, respectfully requests an extension of thirty (30) days to Monday, February 1, 2016 to file his Initial Brief and Designation of Matter to be Included in the Record on Appeal.

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 Appellant

December 30, 2015
Greenwood, South Carolina

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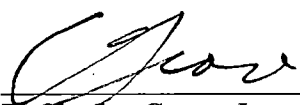
v.

Nakia Johnson, Appellant.

PROOF OF SERVICE

I certify that I have served the 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


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December 30, 2015
Greenwood, South Carolina

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December 30, 2015

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SC Court of Appeals

The Honorable, Jenny Abbott Kitchings
Clerk of Court, S.C. Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: *State v. Nakia Johnson*
Court of Appeals Case No. 2015-001436

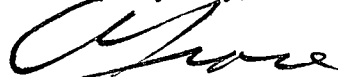
Dear Ms. Kitchens:

Enclosed please find the original and six copies of Mr. Johnson's Petition to file his initial brief. By copy of this letter to Mr. Aplin, I am serving the State of South Carolina.

Thank you for your attention to this matter. Please let me know if you have any questions or require additional information.

With kindest regards, I am

Yours very truly,



E. Charles Grose, Jr.

cc: Mr. Nakia Johnson
J. Benjamin Aplin, Esquire