

# BLUME NORRIS & FRANKLIN-BEST, LLC

## ATTORNEYS AT LAW

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January 11, 2016

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

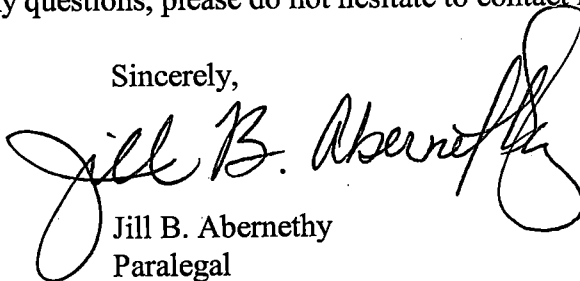
RE: *Charles N. Vandross v. State of South Carolina*

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.

**RECEIVED**

JAN 13 2016

**S.C. SUPREME COURT**

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

**RECEIVED**

JAN 13 2018

**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 **15 day** (15) final 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 had an evidentiary hearing in a state capital case, *William Oliver Dickerson v. State of South Carolina*, 2012-CP-10-3216, on December 7-8, 2015. Counsel had 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 was held on November 20, 2015.

3. 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.*

4. Counsel have reviewed the draft of this petition with petitioner on January 7, 2015. Counsel simply request one final extension to complete editing of the pleading.

WHEREFORE, the undersigned counsel respectfully request a fifteen day (15) 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  
Blume Norris & Franklin-Best, LLC  
900 Elmwood Avenue, Suite 101  
Columbia, South Carolina 29201  
(803)765-1044

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

BY: 

*Counsel for Petitioner*

January 11, 2015.

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

**RECEIVED**

JAN 13 2016

APPEAL FROM GREENWOOD COUNTY  
Court of Common Pleas

**S.C. SUPREME COURT**

The Honorable Clifton Newman, Circuit Court Judge

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Case No. 2010-CP-24-0259  
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CHARLES N. VANDROSS..... Petitioner,

v.

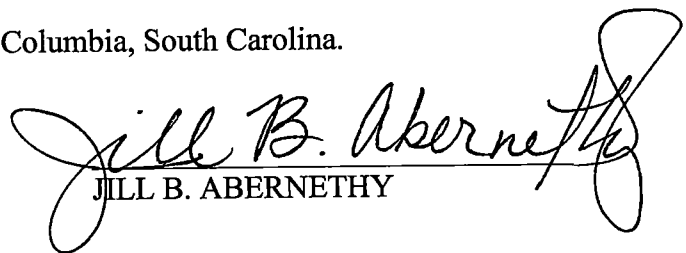
STATE OF SOUTH CAROLINA..... Respondent.

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CERTIFICATE OF SERVICE  
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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 11<sup>th</sup> day of January, 2016, in Columbia, South Carolina.

  
JILL B. ABERNETHY