

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

Court of Appeals Case No. 2015-001436

RECEIVED

FEB 03 2016

SC Court of Appeals

The State of South Carolina,.....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 Wednesday, March 2, 2016. This petition is the second request for an extension. This request is based on the following grounds:

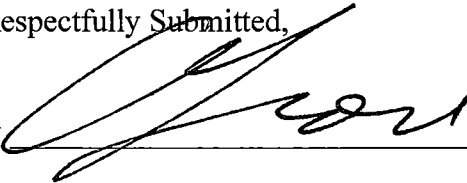
- 1) In January 2016 counsel filed two initial briefs in this Court, *State v. Michael Beaty* and *State v. Preston Shands, Jr.*, both involving sentences of life imprisonment without the possibility of parole. Also in January 2016, in the Supreme Court, counsel filed a response to the State's petition for an extraordinary writ of *certiorari* in *Jerry Inmon v. State*, a capital PCR.
- 2) Counsel has begun work on this case.
- 3) This request is made in good faith and is not intended for delay. Counsel believes good cause exists for this extension request.

Mr. Johnson, therefore, respectfully requests an extension of thirty days to Wednesday, March 2, 2016 to file his Initial Brief and Designation of Matter to be Included in the Record on Appeal.

IT IS SO MOVED.

Respectfully Submitted,

By

A handwritten signature in black ink, appearing to read "E. Charles Grose, Jr.", written over a horizontal line.

E. Charles Grose, Jr.
The Grose Law Firm, LLC
404 Main Street
Greenwood, SC 29646
Phone: 864-538-4466
Email: Charles@groselawfirm.com

February 1, 2016
Greenwood, South Carolina

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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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February 1, 2016
Greenwood, South Carolina

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Web: GroseLawFirm.com

February 1, 2016

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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

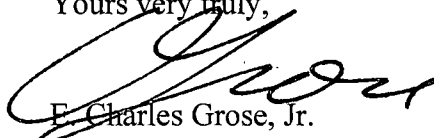
Dear Ms. Kitchens:

Enclosed please find the original and six copies of Mr. Johnson's petition for an extension to file his initial brief and designation of matter to be included in the record on appeal. 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,

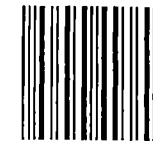

E. Charles Grose, Jr.

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

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The Honorable Jenny Abbott Kitchings
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