

**The Grose Law Firm, LLC**  
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February 12, 2016

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

**RECEIVED**

FEB 16 2016

**S.C. SUPREME COURT**

Re: *Frank Daniel Simpson v. State of South Carolina*  
Appellate Case No. 2015-001439

Dear Mr. Shearouse:

Enclosed please find the original and six copies of Mr. Simpson's Petition for Extension of Time to File Return to the State's Petition for a Writ of *Certiorari*. By copy of this letter to Ms. Ratigan, I am serving the State of South Carolina.

Thank you for your attention to this matter. If you have any questions or require additional information, please do not hesitate to contact me.

With kindest regards, I am

Yours very truly,



E. Charles Grose, Jr.

cc: Mr. Frank Simpson  
Karen C. Ratigan, Esquire

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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**RECEIVED**

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

FEB 18 2016

Eugene C. Griffith, Jr., Circuit Court Judge

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**S.C. SUPREME COURT**

Appellate Case Number: 2015-001439

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Frank Daniel Simpson

Respondent,

v.

State of South Carolina,

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Petitioner.

**Petition for Extension of Time to File  
Return to the State's Petition for a Writ of *Certiorari***

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The respondent, Frank Simpson, petitions this Court for an order extending the time to file his Return to the State's Petition for a Writ of *Certiorari*. This petition is based on the following grounds:

- 1) This petition is a first request for an extension.
- 2) During January 2016, counsel filed initial briefs in *State v. Michael Beaty, Jr.*, Court of Appeals Case No. 2015-000718 and *State v. Preston Shands, Jr.*, Court of Appeals Case No. 2015-001199, both involving sentences of life imprisonment without the possibility of parole. Also in January 2016, counsel filed a return to the State's petition for an extraordinary writ of *certiorari* in *Jerry Inmon v. State*, Supreme Court Case No. 2015-002634, a capital post-conviction relief case. In February 2016, counsel

filed a petition for writ of *certiorari* in *Charles Vandross v. State*, Supreme Court Case No. 2014-000650.

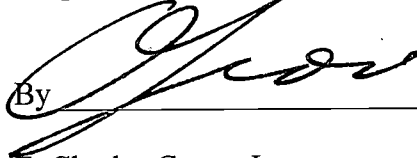
3) Pursuant to the order of the Circuit Court, Mr. Simpson has been released from the Department of Corrections on an appeal bond and lives with his family in Chapel Hill, North Carolina, subject to supervision of the Greenville County Home Incarceration Program. Counsel and Mr. Simpson met on February 12, 2016 to review the State's petition and discuss Mr. Simpson's return.

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

Ms. Simpson, therefore, respectfully requests an extension of thirty days to Monday, March 14, 2016 in order to file his Return to the State's Petition for a Writ of *Certiorari*.

IT IS SO MOVED.

Respectfully submitted,

By 

E. Charles Grose, Jr.  
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February 12, 2016  
Greenwood, South Carolina

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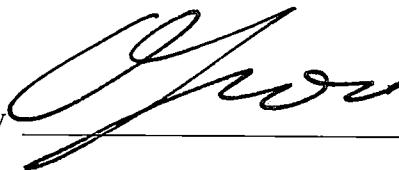
Certificate of Service

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I certify that I have served a copy of this pleading on the State of South Carolina by placing a copy in the United States Mail, postage prepaid, on date reflected below, addressed as follows:

Karen C. Ratigan, Esquire  
Office of the Attorney General  
P.O. Box 11549  
Columbia, SC 29211

By



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Greenwood, South Carolina