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SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM ABBEVILLE COUNTY  
Court of Common Pleas  
Eugene C. Griffith, Jr., Circuit Court Judge

Court of Appeals Case No. 2015-002090

William Crenshaw, .....Appellant

v.

Erskine College and David Norman, ..... Respondents.

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

The appellant, William Crenshaw, 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 15, 2016. This petition is the second request for an extension. This request is based on the following grounds:

- 1) This is an appeal of a jury trial in a civil case. The transcript, 689 pages, requires careful review.
- 2) During January 2016, Mr. Grose 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,

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

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

Mr. Crenshaw, therefore, respectfully requests an extension of thirty days to Thursday, March 17, 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



Robert J. Tinsley, Sr.  
R. Jamison Tinsley, Jr.  
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Greenwood, SC 29649  
Email: tinslerj@gmail.com  
Phone: (864) 223-0770

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

This 16<sup>th</sup> day of February, 2016.

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In The Court of Appeals

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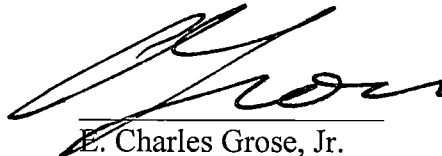
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PROOF OF SERVICE

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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:

L. Grant Close III, Esquire  
Thomas H. Keim Jr., Esquire  
100 Dunbar St., Ste. 300  
Spartanburg, SC 29306



E. Charles Grose, Jr.  
The Grose Law Firm, LLC  
404 Main Street  
Greenwood, SC 29646  
(864) 538-4466

February 16, 2016  
Greenwood, South Carolina

**The Grose Law Firm, LLC**  
404 Main Street, Greenwood, South Carolina 29646

E. Charles Grose, Jr.  
Phone: 864-538-4466 Fax: 864-538-4405  
E-mail: charles@groselawfirm.com  
Web: GroseLawFirm.com

February 16, 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: *William Crenshaw v. Erskine College and David Norman*  
Court of Appeals Case No. 2015-002090

Dear Ms. Kitchens:

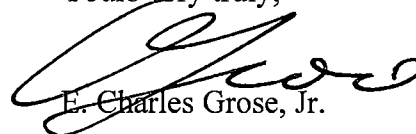
Enclosed please find the original and six copies of Mr. Crenshaw's Petition to Extend Time to File his Initial Brief and Designation of Matter to be Included in the Record on Appeal along with the filing fee.

By copy of this letter to Mr. Close and Mr. Keim, I am serving the respondents

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: Robert J. Tinsley, Sr., Esquire  
R. Jamison Tinsley, Jr., Esquire  
L. Grant Close III, Esquire  
Thomas H. Keim Jr., Esquire

The Grose Law Firm, LLC  
404 Main Street  
Greenwood, SC 29646



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