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APPELLANT'S MOTION FOR AN
EXTENSION

SC SUPREME COURT

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THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

SC Court of Appeals

APPEAL FROM GREENVILLE COUNTY
COURT OF COMMON PLEAS

LOWER COURT CASE NO. 2014-CP-23-05661

APPELLATE CASE NO. 2015-000697

George Cleveland, III

APPELLANT

v.
GREENVILLE COUNTY SHERIFFS
OFFICE,

RESPONDENT

George Cleveland, III #35770
TURBEVILLE CORRECTIONAL INST.
P.O. BOX 252
TURBEVILLE, S.C. 29162
PRO SE APPELLANT.

WILSON JONES CARTER + BAXLEY, P.A.
CHARLES F. TURNER, JR., ESQUIRE
ANNE ROSS CULBREATH, ESQUIRE
872 S. PLEASANTBURG DRIVE
GREENVILLE, S.C. 29607
ATTORNEYS FOR RESPONDENT

MOTION FOR AN EXTENSION

IF IT PLEASES THE COURT: George Cleveland, III,
proceeding pro se, respectfully moves this court for
an extension of time to FILE PETITION FOR AN WRIT
OF CERTIORARI on the following grounds:

MULTIPLE PRISON-LOCK-DOWNS, AND
LEGAL MATERIAL RESTRICTIONS.

2.
REHEARING DECISION FILED
ON JANUARY 28, 2016

This court DENIED my Rehearing En Banc Petition
And it was filed on JANUARY 28, 2016, R.P. 1 (copy
of order), thus under the Appellate Court Rules,
my Petition for an writ of certiorari must be
FILED "within thirty (30) days after the petition for
rehearing..."

within 30 days from the file day of JANUARY 28,
2016 triggers my deadline to file petition with this
court at: FEBRUARY 27, 2016; however, since this deadline

falls on the weekend (Saturday), my time for filing this motion for an extension ... "runs until the end of the next day which is neither a Saturday, Sunday, nor such holiday, Rule 234 (A) S.C.A.C.R.; Accordingly, this court still has jurisdiction to GRANT my motion for an extension.

3.

PRISON-LOCK-DOWNS/LEGAL-BOX SEPARATION:

Turbeville Correctional Institution is my current assigned prison. I WAS GRANTED permission to report to the LAW LIBRARY on February 02, 2016, February 09, 2016, and February 17, 2016, but I could not report to conduct legal research and prepare for this petition because my dorm and/or the entire prison was on lockdown. R.P. 2 AT PAR 2 (AFFIDAVIT) the multiple lockdowns caused me to miss my deadline in this court to file my petition for Certiorari along with the

1. supra, AT PAR. 2.

2.

separation of two (2) of my Legal Boxes², that stored my records for this case, in violation of my First Amendment Right to Access the courts under the United States Constitution, and under Lewis v. Casey, 518 U.S. 343, 116 S. Ct. 2174 U.S. ARIZ. (1996), id. at 2178-2179; Accordingly, I have standing to request an extension of time to petition this court for an writ of certiorari in this court. Based on the foregoing facts I respectfully request the following:

4.
CONCLUSION:

WHEREFORE, I GRANT my motion for an extension to file my PETITION FOR AN WRIT OF CERTIORARI until:

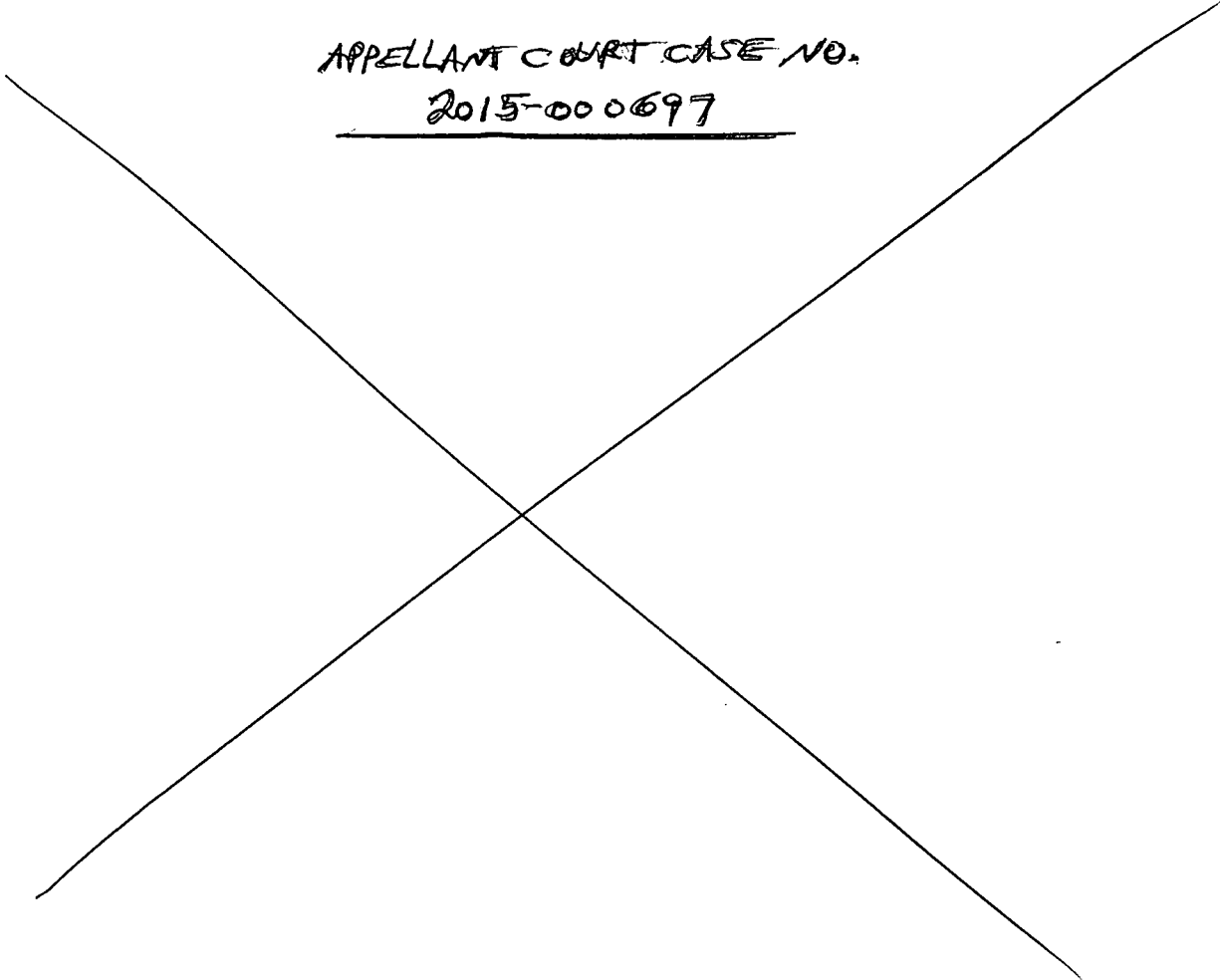
MARCH 23, 2016

And other relief this court deems just and/or proper

², the evening of 2/11/16, when returning to turbeville Correctional Institution from court I was only allowed to take one (1) of my three (3) Legal Boxes back to my cell room. R.P. 2 At PAR. 3,
3.

APPELLANT COURT CASE NO.

2015-000697



Respectfully submitted,

~~W. R. III~~

George Cleveland, III #357770
TURBEVILLE CORRECTIONAL INST.
P.O. - Box 252
TURBEVILLE, S.C. 29162

DATED: FEBRUARY 27, 2016

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APPELLANT'S PROOF OF SERVICE

SC SUPREME COURT

THE STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

APPEAL FROM GREENVILLE COUNTY

COURT OF COMMON PLEAS

LOWER COURT CASE NO. 2014-CP-23-85661

APPELLATE CASE NO. 2015-000697

George Cleveland, III,

v.

GREENVILLE COUNTY SHERIFFS
OFFICE,

APPELLANT,

RESPONDENT.

George Cleveland, III, #35770
TURBEVILLE CORRECTIONAL INST.
P.O. Box 252
TURBEVILLE, S.C. 29162
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SC SUPREME COURT

APPELLATE CASE No 201500697

I, George Cleveland, III, proceeding pro se, certifies that on the date below, by and through the turbeville Correctional Institution's mail room, properly addressed, and with proper united states mail postage, the following on the date below:

APPELLANT'S MOTION FOR AN EXTENSION;
APPELLANT'S SUPPORTING APPENDIX;
AND APPELLANT'S PROOF OF SERVICE to the following parties: (and Appellant's MOTION TO FILE EXTENSION MOTION AS timely, and support affidavit) on March 1, 2016,
Wilson Jones CARTER + Baxley, P. A.
Charles F. Turner, Jr., Esquire.
Ann Ross Culbreath, Esquire
872 S. Pleasantburg Drive
Greenville, S.C. 29607
Attorneys for Respondent.

Respectfully submitted,



George Cleveland, III #357770
TURBEVILLE CORRECTIONAL INST.
P.O. BOX 252
TURBEVILLE, S.C. 29162

Dated: ~~February 29, 2016~~
~~AND~~ MARCH 01, 2016

TURBEVILLE C. I.
MAIL ROOM
BOX 252
TURBEVILLE, S. C. 29162

George Cleveland III #357770, PC 219



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SC SUPREME COURT

Legal MAIL

The South CAROLINA Court of Appeals
Jenny Abbott Kitchings, clerk of court
P.O. Box 11629
Columbia, SC - 29211

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TURBEVILLE CI

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