

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM KERSHAW COUNTY  
Court of General Sessions  
Doyet A, Early, III, Circuit Court Judge

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Court of Appeals Case No. 2015-001436

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**RECEIVED**  
MAR 04 2016  
SC Court of Appeals

The State of South Carolina,..... Respondent

v.

Nakia Johnson,..... Appellant.

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

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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 Friday, April 1, 2016. This petition is the third request for an extension. This request is based on the following grounds:

1) 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.

2) In February 2016, counsel filed a petition for writ of *certiorari* in *Charles Vandross v. State*, Supreme Court Case No. 2014-000650. Counsel filed a petition for

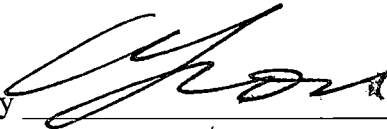
writ of certiorari in the Supreme Court of the United States in *Edward Dean & Nolan Brown v. Mark Keel in his official capacity*. Counsel was scheduled to defend a murder charge starting on Monday, February 29, 2016, *State v. Trey Brown*, Abbeville Case No. 2014-GS-01-0111, 0112. Although that case resolved the morning of trial, it involved complicated mental health issues and trips to DMH for a competency evaluation and a meeting with the client.

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 this Court to extend time to file the petition for writ of *certiorari* until Friday, April 1, 2016.

IT IS SO MOVED.

Respectfully Submitted,

By 

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

*Attorney for Petitioner*

March 2, 2016  
Greenwood, South Carolina

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In The Court of Appeals

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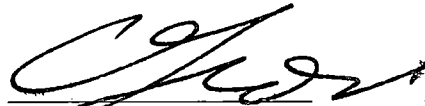
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PROOF OF SERVICE

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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:

J. Benjamin Aplin, Esquire  
Office of the Attorney General  
P.O. Box 11549  
Columbia, SC 29211



E. Charles Grose, Jr.  
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Greenwood, SC 29646  
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March 2, 2016  
Greenwood, South Carolina

**The Grose Law Firm, LLC**  
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E-mail: charles@groselawfirm.com  
Web: GroseLawFirm.com

March 2, 2016

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The Honorable, Jenny Abbott Kitchings  
Clerk of Court, S.C. Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

MAR 04 2016

**SC Court of Appeals**

Re: *State v. Nakia Johnson*  
Court of Appeals Case No. 2015-001436

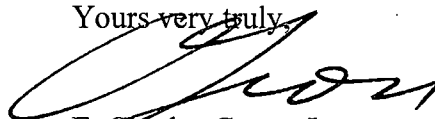
Dear Ms. Kitchens:

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

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



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The Honorable Jenny Abbott Kitchings  
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