

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

MAR 17 2016

Eugene C. Griffith, Jr., Circuit Court Judge

S.C. SUPREME COURT

Appellate Case Number: 2015-001439

Frank Daniel Simpson

Respondent,

v.

State of South Carolina,

Petitioner.

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

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 second 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) 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.

4) In March 2016, Counsel has filed a Brief in Opposition to the State's Petition for Writ of *Certiorari* in *South Carolina v. John Kennedy Hughey*, United States Supreme Court Case Number 15-880.

5) 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 Wednesday, April 13, 2016 in order to file his Return to the State's Petition for a Writ of *Certiorari*.

IT IS SO MOVED.

(signature on next page)

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 20646  
(864) 538-4466

March 14, 2016  
Greenwood, South Carolina

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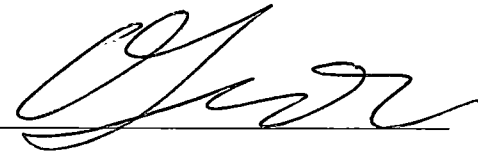
Certificate of Service

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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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March 14, 2016  
Greenwood, South Carolina

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

**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