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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

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MAR 18 2016

SC Court of Appeals

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 Friday, April 15, 2016. This petition is the third 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. The record also contains numerous trial exhibits and post-trial pleadings.

2) Mr. Grose is nearing the end of an unusually busy period of his practice. 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. 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. 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.

3) Mr. Jamison Tinsley has been busy with court appearances had filed a initial brief in this Court in *King v. Miller* and a final brief in *Richey v. Estate of Williams*.

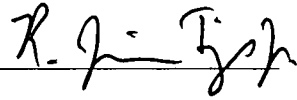
4) Counsel have completed their review of the transcript, begun drafting the brief, and do not anticipate the need to request any additional extensions.

5) This request is made in good faith and is not intended for delay. Counsel believes extraordinary circumstances exists for this extension request.


Mr. Crenshaw, therefore, respectfully requests an extension of thirty days to Thursday, April 15, 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 

R. Jamison Tinsley, Jr.
Robert J. Tinsley, Sr.
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By 

E. Charles Grose, Jr.
The Grose Law Firm, LLC
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Phone: 864-538-4466
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This 16th day of March, 2016.

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PROOF OF SERVICE

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.
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March 16, 2016
Greenwood, South Carolina


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March 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

Greenwood, SC 29646

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
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