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MAR 29 2016

PETITIONER'S MOTION FOR LEAVE  
TO REQUEST AN EXTENSION  
FOR SECOND TIME

THE STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

APPEAL FROM GREENVILLE COUNTY

COURT OF COMMON PLEAS

JAMES R. BARBER, III, CIRCUIT COURT JUDGE

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

APPELLATE CASE NO. 2015-000697

APPELLATE CASE NO. 2016-000498

George Cleveland, III,

v.

GREENVILLE COUNTY SHERIFF'S  
OFFICE,

PETITIONER

RESPONDENT

MOTION FOR AN EXTENSION

WILSON JONES CARTER + BAXLEY, P.A.  
CHARLES F. TURNER, JR., ESQUIRE  
ANNE R. CULBREATH, ESQUIRE  
872 S. PLEASANTBURG DRIVE  
GREENVILLE, S.C. 29607  
TELEPHONE (864)-672-3713  
ATTORNEYS FOR RESPONDENT.

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

1.  
MOTION FOR AN EXTENSION  
FOR 2ND TIME!

MAY IT PLEASE THE COURT: George Cleveland, III,  
proceeding pro se, respectfully moves this court FOR AN  
EXTENSION OF TIME (2nd-Request) TO FILE PETITION  
FOR AN WRIT OF CERTIORARI IN THIS COURT ON THE  
following grounds:

Cell-Room-Light Inoperable;  
Another LEGAL DEADLINE IN THIS COURT;  
AND LACK OF LEGAL WHITE PAPER;

2.  
ARGUMENT!

My cell-room light (Dorm: TAWCAW-A-side Room 118)  
WAS without a light from MARCH 20-23, 2016. Sunday WAS  
very cloudy (MARCH 20, 2016); therefore, I had trouble  
seeing in my room to write. See ATTACHED AFFIDAVIT AT PAR.  
2 (hereinafter A.A.).

Furthermore, I barely timely filed my Post conviction  
Relief petition in this court on MARCH 21, 2016 (Appellate  
CASE NO. 2015-002251). A.A. AT PAR. 3.

Also, even if I had my over-head light in my  
cell-room, I lacked sufficient supply of legal white

PAPER. TO PREPARE MY BRIEFS, AND APPENDIX  
TO TIME FILE MY PETITION FOR A WRIT OF CERTIORARI  
IN THIS CASE; CONSEQUENTLY, I NEED MORE TIME TO  
PREPARE MY NON-TRIVIOUS PETITION. A.A. AT PAR. 4.

3.

LEGAL-ANALYSIS:

UNDER THE FIRST (ACCESS TO THE COURTS) AND FOURTEENTH  
(DUE PROCESS LIBERTY-PROPERTY INTEREST) AMENDMENTS UNDER  
THE UNITED STATES CONSTITUTION PROTECTS ME BY WAY OF  
THESE RIGHTS TO ACCESS THE COURTS, AND FOR THE  
SCDC. TO PROVIDE TO ME "WITH PAPER AND PEN  
TO DRAFT LEGAL DOCUMENTS"... AT "STATE EXPENSE"  
BOUNDS V. SMITH, 430 U.S. 817, 97 S.Ct. 1491 U.S. NO.  
(1977), ID. AT 824-25,

BECAUSE I HAD NO LIGHT IN MY CELL ROOM, SUPRA,  
AT PAR. 2, THE LACK OF LEGAL WHITE PAPER, AND MY  
MARCH 21, 2016 DEADLINE FOR MY P.C.R. CASE, SUPRA, AT PAR. 2,  
CAUSED ME TO MISS THIS DEADLINE TO FILE MY PETITION  
FOR A WRIT OF CERTIORARI IN THIS CASE, THUS CAUSING ME  
ACTUAL INJURY UNDER LEWIS V. CASEY 518 U.S. 343, 116 S.Ct.  
2174 U.S. 12 (1996) ID AT 2178-79; ACCORDINGLY, I HAVE

STANDING to Request additional time to prepare  
and FILE my WRIT OF CERTIORARI in this case.

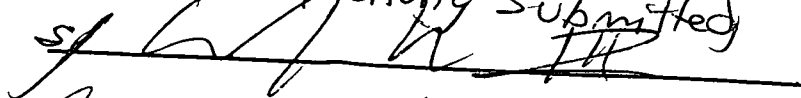
4.  
CONCLUSION:

Based on the foregoing facts, I pray for the following  
relief:

GRANT my motion for an extension of time  
(for the 2nd time) to file my WRIT OF CERTIORARI petition  
with this court in Appellate case No. 2016-000498  
until: APRIL 07, 2016.

Any other relief this court deems just, proper, and/or  
equitable.

Respectfully submitted



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

Dated: MARCH 24, 2016.

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AFFIDAVIT BY GEORGE CLEVELAND, III  
IN RE TO: EXTENSION OF SUPREME COURT  
APPELLATE CASE NO. 2016-000498

MAR 29 2016

1. I, George Cleveland, III, swear under the penalty of perjury the following is true and correct to the best of my knowledge:

2. My cell-room located in: DORM TAWCAW ASIDE Room no. 118 AT TURBEVILLE CORRECTIONAL INST. WAS without a light from: MARCH 20-23, 2016 until it WAS REPAIRED AFTER FILING AN GRIEVANCE.

3. The lack of light in my room put me further behind with my P.C.R. certiorari petition in Appellate case NO-2015-002251. AFTER REPEATED REQUEST TO SGT. TOLLINSON ON 3/20/16 (FROM NOON-5:30 P.M.) TO CALL TO PRISON OPERATIONS AND ASK SHIFT CAPTAIN PACK IF I COULD use my DORM'S DAYROOM (WHICH HAD LIGHT) WERE IGNORED.

4. My P.C.R. petition consumed A lot of my legal white paper, thus, I may could had not completed my petition and supporting Apperidix but I could of gotten started at least.

SWORN to and subscribed before me this  
24<sup>th</sup> day of March 2016  
[Signature] (L.S.)  
Notary Public for South Carolina

My Commission Expires: 4-27-2016

AFFIANT'S SIGNATURE  
[Signature]  
George Cleveland III #357770

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PETITIONER'S PROOF OF SERVICE

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GREENVILLE COUNTY SHERIFF'S  
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P.O. BOX 252  
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SC/SUPREME COURT

To George Cleveland III, certifies that on the date below, by, and through the Turbeville Correctional Institutional's mailroom, properly addressed, proper postage affixed served the following legal documents:

- Petitioner's second motion for an extension;
- Petitioner's motion to proceed in forma pauperis regarding motion fee;
- Proof of service.

The following attorneys were served:

Wilson Jones Carter + Barley, P.A.  
 Charles F. Turner, Jr., Esquire  
 Anne R. Culbreath, Esquire  
 872 S. Pleasantburg Drive  
 Greenville, S.C. 29607  
 Telephone: (864) 467-3713  
 Attorneys for Respondent.

Respectfully Submitted

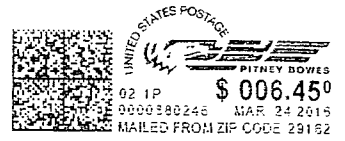


George Cleveland III #357770  
 Turbeville Correctional Inst.  
 P.O. Box 252  
 Turbeville, S.C. 29162

DATED: MARCH 24, 2016

TURBEVILLE, S. C.

George Cleveland III #35773T4118



**RECEIVED**  
 MAR 25 2016  
 MAIL ROOM  
 TURBEVILLE CI

Legal Mail  
 The Supreme Court of South Carolina  
 Daniel E. Shearouse, clerk of court  
 P.O. Box 11330  
 Columbia, SC 29211