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April 13, 2016

RECEIVED

APR 18 2016

S.C. SUPREME COURT

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

Re: *Frank Daniel Simpson v. State of South Carolina*
Appellate Case No. 2015-001439

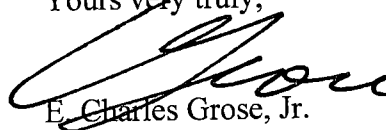
Dear Mr. Shearouse:

Enclosed please find the original and six copies of Mr. Simpson's petition for order requiring the State of South Carolina to supplement the Appendix and to hold in abeyance the deadline for Mr. Simpson to file his Return to the State's Petition for a Writ of *Certiorari*.

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

THE STATE OF SOUTH CAROLINA
In The Supreme Court

RECEIVED

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

APR 18 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 order requiring the State of South Carolina to supplement the Appendix and to hold in abeyance the deadline for Mr. Simpson to file his Return to the State's Petition for a Writ of Certiorari.

The respondent, Frank Simpson, petitions this Court for an order requiring the State of South Carolina to supplement the Appendix and to hold in abeyance the deadline for Mr. Simpson to file his Return to the State's Petition for a Writ of *Certiorari*. This petition is based on the following grounds:

1) Mr. Simpson's Return to the State's Petition for a Writ of *Certiorari* is due today. Counsel for Mr. Simpson has nearly completed the Return. While preparing the return, counsel realized that the following items are not included in the Appendix:

- a. Mr. Simpson's pre-hearing memorandum of law;
- b. Applicant's Exhibit Number 1;
- c. The initial order of dismissal; and

d. The attachments to Mr. Simpson's Rule 59(e), SCRC Motion.

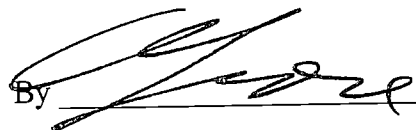
2) Pursuant to Rule 243(f)(1), SCACR, counsel believes these materials should be included in the appendix.

3) Prior to filing this petition, counsel for Mr. Simpson has communicated with counsel for the State and understands the State will not oppose this request.

Ms. Simpson, therefore, respectfully requests this Court issue an order requiring the State of South Carolina to supplement the Appendix and to hold in abeyance the deadline for Mr. Simpson to file his Return to the State's Petition for a Writ of *Certiorari*.

IT IS SO MOVED.

Respectfully submitted,

By 

E. Charles Grose, Jr.
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Greenwood, South Carolina

THE STATE OF SOUTH CAROLINA
In The Supreme Court

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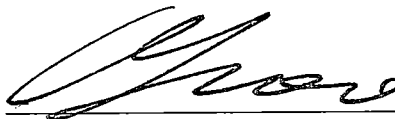
Petitioner.

Certificate of Service

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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