

THE STATE OF SOUTH CAROLINA
In The Supreme Court

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APR 22 2016

APPEAL FROM RICHLAND COUNTY

S.C. SUPREME COURT

James R. Barber, III, Circuit Court Judge

Appellate Case Number: 2014-001774

Phillip H. Crocker, III

Petitioner,

v.

State of South Carolina

Respondent.

Petition to Extend Time to File Petition for Writ of *Certiorari*

The Petitioner, Phillip H. Crocker, III, petitions this Court to extend time to file the petition for writ of *certiorari* until Monday, April 20, 2016.

- 1) This is a third 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. Counsel is scheduled to defend a murder charge starting on Monday, February 29, 2016, *State v. Trey Brown*, Abbeville Case No. 2014-GS-01-0111, 0112. 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 and, just today, a Response to State's Motion to Expedite Petition for Extraordinary Writ in *Jerry Inmon v. State, supra*. Counsel is resumed the evidentiary hearing in *William O. Dickerson v. State*, Charleston County Cases Number: 2012-CP-10-3216, a capital PCR case, on March 31, 2016 and is preparing to resume it again on April 12-13, 2016. In April 2016, counsel filed a Reply to the State's Brief in Opposition to a petition for writ of certiorari in *Dean and Brown v. Keel*, SCOTUS Case No. 15-8412 and a petition for writ of certiorari in this Court on *State v. Tommie Weathers, Jr.*, Appellate Case No. 2015-00636.

3) In addition to other practice obligations, counsel has had a large number of appellate filings in 2016, most involving serious cases. The Appendix in this case will be over 2500 pages. Counsel is methodically working though all of these cases and is blocking time to complete work on this case.

4) This request is made in good faith and is not intended for delay. Counsel believes good cause exists for this extension request.

Mr. Crocker, therefore, respectfully requests this Court to extend time to file the petition for writ of certiorari until Friday, May 20, 2016.

IT IS SO MOVED.

By 

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

Attorney for Appellant

April 20, 2016
Greenwood, South Carolina

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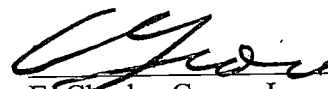
State of South Carolina

Respondent.

Certificate of Service

I certify that I serve a copy of this petition on the State of South Carolina and prior appointed counsel by placing a copy in the US Mail, postage prepaid, on the date reflected below.

Megan Harrigan Jamison, Esquire
Office of the Attorney General
P.O. Box 11549
Columbia, SC 29211



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April 20, 2016
Greenwood, South Carolina

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April 20, 2015

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

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Re: *Phillip H. Crocker, III vs. State of South Carolina*
Appellate Case No. 2014-001774

S.C. SUPREME COURT

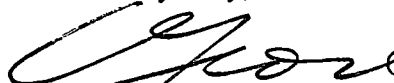
Dear Mr. Shearouse:

Enclosed for filing, please find the original and six copies of Petition to Extend Time to File Petition for Writ of *Certiorari*, along with certificate of service.

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: Megan Harrigan Jameson, Esquire