

The Supreme Court of South Carolina

Lionel Bradley #266225
Petitioner

Appellate case:

2015-002425

v.

State of South Carolina

Respondent

Motion to Enlarge

RECEIVED

JUN 08 2016

S.C. SUPREME COURT

Comes Now the Petitioner,

Lionel Bradley respectfully motioning this honorable Court to Enlarge Time for the filing of the pro se Johnson brief in the appellate case number 2015-002425 which is presently before this Court on petition for writ of certiorari. The following extraordinary circumstances establishes causes to grant an enlargement of time in this case:

- 1) The Supreme Court of South Carolina mailed a notice letter addressed to Petitioner Lionel Bradley, dated April 12, 2016, informing Bradley any pro se Johnson brief submission he may intend to file to the Supreme Court must be filed within forty-five (45) days of April 12, 2016 ... eg May 27, 2016.

2) The Broad River prison mailroom personnel negligently served Petitioner's Supreme Court notice letter on an unknown prison inmate on May 12th, 2016. The Broad River prison mailroom personnel thereafter recognized the mistake and obtained possession of Petitioner's Supreme Court notice letter. At no time did the Broad River prison mailroom personnel notify the Petitioner that they had in their possession a letter from the Supreme Court addressed to him.

3) On June 1, 2016 for the first time, the Broad River prison mailroom personnel notified the Petitioner that they had in their possession two (2) pieces of legal mail addressed to him, one from the Supreme Court of S.C. and the other from S.C. Indigent Defense. The Petitioner promptly went to the Broad River prison mailroom and signed receipt for these two (2) pieces of legal mail for the first, and only, time, on June 1, 2016. The reading of the Supreme Court's letter on June 1, 2016 is the first time the Petitioner was placed on notice of the forty-five (45)

days deadline within which he may file a pro-se Johnson brief. The Petitioner has every intention of filing a pro se Johnson brief. (see Exhibit # 1)

4) There is presently filed before this Court a Motion for Appointment of Outside Counsel submitted by Appellate Defender Robert M. Pachak which seeks the withdrawal of the S.C. Indigent Defense as counsel for the petitioner, appointment of outside counsel to represent the petitioner and abeyance of the appellate filing timelines until such time the Supreme Court resolves the conflict of interest or potential conflict of interest or potential conflict of interest which is at the core of the reasons why the Motion for Appointment of Outside Counsel was filed.

5) The Petitioner attests, deposes, swears and say that the entire contents of the four corners of this Motion to Enlarge Time is true under penalty of perjury.

Sworn and Subscribed before me

this 3rd day of June 2016

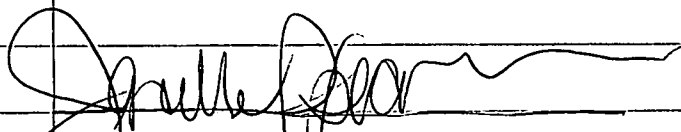


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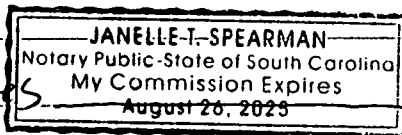
BRCI

4460 Broad River Rd

Columbia S.C. 29210


Notary public for South Carolina

My Commission Expires







MAR 11 2016
BRCI
MAILROOM

Monticelli

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
Office of General Counsel
LEGAL/PRIVILEGED/CERTIFIED MAIL DELIVERY LOG

EXHIBIT #1

Monticelli

Date Received	Inmate Name and SCDC Number	Sender's Name and Address	Date Mail/Order to Report Delivered to Inmate	Inmate's Recipient's Signature	Inspected/Delivered in Inmate's Presence By	Comments
5/16	ANTONIO BURTON 237586	Atty C.R. Wise 305 Main St. Greenville, SC 29646	6-1-16			
5/16	BENJAMIN NEUMAN 352892	Atty Thelma Blanche H2 PO Box 12725 Columbia, SC 29211	6-1-16			
5/16	ROY McSWAIN 298325	Coner Reporter PO Box 743 York, SC 29745	5/21/16	X R. McSwain	Spencer 5/15/16	
5/16	DANIEL BROWN 192642	Saleby's Coy 311 W. Home Ave. Hartsville, SC 29551	5/12/16	D. Brown	Pat	
5/16	KIOUEN BRADLEY 266225	Supreme Court, SC PO Box 11330 Columbia, SC 29211	6-1-16		Pat	
		SC Indigent Defense PO Box 11589 Columbia, SC 29211	6-1-16			2 pcs

