

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM KERSHAW COUNTY
Court of General Sessions
Doyet A, Early, III, Circuit Court Judge

RECEIVED

AUG 01 2016

Court of Appeals Case No. 2015-001436

SC Court of Appeals

The State of South Carolina, Respondent

v.

Nakia Johnson, Appellant.

Petition for Extension of Time to File Initial Reply Brief

The appellant, Nakia Johnson, petitions this Court for an order extending the time to file his initial reply brief for ten days until Monday, August 8, 2016. This petition is the third request for an extension. This request is based on the following grounds:

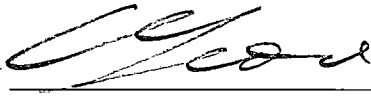
1) Since the last week in June, counsel has completed two homicide trials, *State v. Bennie Brown, Jr.* and *State v. Brandon Holmes*. Counsel's other obligations in the trial and appellate court's have prevented him from completing this brief.

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

Mr. Johnson, therefore, respectfully requests this Court to extend time to file the petition for writ of *certiorari* until Monday, August 8, 2016.

IT IS SO MOVED.

Respectfully Submitted,

By 

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

Attorney for Petitioner

July 29, 2016
Greenwood, South Carolina

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PROOF OF SERVICE

I certify that I have served the Petition for Extension of Time to file the Initial Reply Brief, by placing a copy in the United States Mail, postage prepaid, on the date reflected below, addressed as follows:

William M. Blich, Jr., Esquire
Office of the Attorney General
P.O. Box 11549
Columbia, SC 29211



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

July 29, 2016
Greenwood, South Carolina

The Grose Law Firm, LLC
404 Main Street, Greenwood, South Carolina 29646

E. Charles Grose, Jr.
Phone: 864-538-4466 Fax: 864-538-4405
E-mail: charles@groselawfirm.com
Web: GroseLawFirm.com

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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: *State v. Nakia Johnson*
Court of Appeals Case No. 2015-001436

Dear Ms. Kitchens:

Enclosed please find the original and six copies of Mr. Johnson's petition for an extension to file his initial reply brief. By copy of this letter to Mr. Blich, I am serving the State of South Carolina.

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: William M. Blich, Jr., Esquire

J