

Re: Warren Russell V. State of South Carolina

JAN 31 2014

Appellate Case No. 2012-213313

S.C. SUPREME COURT

Objections to the States Request for extension

Petitioner, humbly comes before this Supreme Court objecting to the States Request for a 30 day time extension to respond to petitioner's Writ of Certiorari, for the following reasons:

1) The State only requested said extension on the day it was due to be served, clearly the state with all its man power and resources, were or should have been aware of said service deadline and was given adequate notice and time to respond.

2) Said Request for an extension on that date a response is due, can only be for the purpose of delay and to gain a tactical advantage over petitioner whom is a pro-se litigant, without legal representation

3) The State whom is armed with a multitude of skilled professional attorney, against a unlearned pro-se litigant untrained at the skill of litigation, without any resources, would be and or is clearly prejudiced by such additional delay. Petitioner, Writ of Certiorari was filed in Nov, 2012, counsel was appointed August 1 2013, refused to consult and file petitioner's requested issues, and this honorable must relieve counsel and allowed petitioner to proceed pro-se on Nov, 7, 2013, petitioner's brief was filed Dec 6, 2013, which puts him at 14 months, in Writ of certiorari, and 4 years in PER, unduly long delays, with prejudicial effects.

Petitioner is requesting this honorable court to request the attorney general to show just cause for said requested delay, the day of the deadline, and to prove that said delay is not imposed for the sole purpose of delay or tactical advantage.

Petitioner, further request that the state with all of its resources should only be allowed an extension if they could show just cause, and that said extension be of a time limit of 15 days and not 30 days, because of the unduly long delays that already exist. Furthermore, Petitioner is requesting that if the state fails to respond to petitioner objection and show good cause that default Judgment be rendered against the state for failing to respond, default by silence,

Notice, abandonment, and fees, and any and all other legal remedies under state and federal constitutions.
Moreover, petitioner, as pro se litigant was not given notice by this honorable court of the
State's deadline to file said Return, and because of this breakdown in communication, was prejudiced
because petitioner could have challenged any request for extension by the state in advance of said
request. Petitioner, is aware of all of the technical delay techniques the state have used in the past
and have continued to try to use as of now. Therefore, because petitioner is pro-se, he should
respectfully be given all notice, correspondence, communication, etc, with this court, and the
attorney general office. Thank you

Sincerely,
Warren Russell © pro-se.

CC: The Honorable Daniel E. Sprouse
Clerk of Court, South Carolina Supreme Court
P.O. Box 11330
Columbia, South Carolina, 29211

Office of the Attorney General
P.O. Box 11549
Columbia, South Carolina, 29211-1549

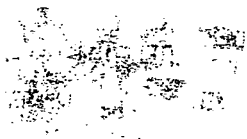
1/22/14,

MR. WAREEN RUSSELL # 316802

Doc # 1260

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South Carolina Supreme Court

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Attn: Clerk of Court

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