

Patrick C. Massey #358341
Kirkland Correctional Institution
4344 Broad River Road
Columbia, SC 29210

September 6, 2016

The Supreme Court of South Carolina
Daniel E. Searouse, Clerk of Court
1231 Gervais Street P.O. Box 11330
Columbia, SC 29201

State of South Carolina
County of Greenville

In The Supreme Court
Case # 2016-000052

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pro se, Patrick Chase Massey SEP 09 2016
Applicant

v.

S.C. SUPREME COURT

Motion for
EXTENSION

State OF SOUTH CAROLINA
Respondent

I, Patrick Chase Massey, respectfully request an extension of sixty (60) days for good cause, in order to obtain records necessary to substantiate my argument ^{at per hearing,} so as to disprove defendant's testimony on the stand. Show forth the argument that Judge erred in not granting continuance to obtain records, and provide the substantive arguement for my claim of ineffective assistance of counsel showing forth the information necessary that insinuates counsel's error in not moving for a court appointed evaluation to determine the affirmative defense of involuntary intoxication.

Formatted requests for my records from the Carolina Center for Behavioral Health, the Brownell Centers, and the Greenville County Detention Center were mailed out in the middle of August allotting the recipients thirty days to respond. I currently have not received a response from either facility/recipients and after receiving a response, it is my understanding that the recipients will have another thirty days to retrieve requested records.

Sixty (60) days should be adequate to obtain these documents and appropriately incorporate them into my Pro Se Response (I am also working toward an Associate of Arts degree in Biblical Studies, and being that my classes are during the morning and afternoon hours, I have an extremely limited amount of time to research the Law Library). I sincerely appreciate your understanding in hopes that you will allow this extension. Thank you for your consideration of this request.

J. C. Massey
Patrick Chase Massey

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT
CASE No. 2016-000052

PRO SE, PATRICK CHASE MASSEY APPLICANT
V.
STATE OF SOUTH CAROLINA RESPONDENT

CERTIFICATE OF SERVICE

I, Patrick Chase Massey, do certify that on this
6th day of September, 2016, served motion for
60 day extension to: The Supreme Court of South
Carolina: Clerks of Court
1231 Gervais Street P.O. Box 11330
Columbia, SC 29201

By depositing in the U.S. Mail with postage
prepaid.

P. C. Massey
Patrick Chase Massey

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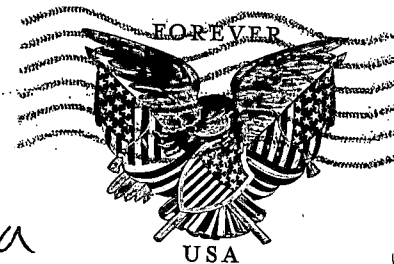
SEP 09 2016

S.C. SUPREME COURT

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