

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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NOV -9 2016

Certiorari to Lexington County

S.C. SUPREME COURT

Honorable William Jeffrey Young, Circuit Court Judge

Alexander Lynch,

Petitioner,

v.

State of South Carolina,

Respondent.

APPELLATE CASE NO. 2016-000516

MOTION FOR ENLARGEMENT OF TIME

Alexander Lynch, the above Petitioner, files this Motion Pro Se and respectfully moves this Honorable Court for an Enlargement Of Time In Which To File a Pro Se Response to the Johnson Petition For Writ Of Certiorari filed by his Counsel in this matter.

Petitioner received a letter dated October 20, 2016 from the Clerk of the South Carolina Supreme Court on October 24, 2016 informing him that his counsel has filed a Petition For Writ of Certiorari indicating that the appeal is without merit and that Petitioner may, within forty-five (45) days of the date of the letter, file a Pro Se response to the Petition filed by counsel. Petitioner also may raise and argue any issues that he believes the Court should consider in this appeal. See (attached copy of

Letter). Petitioner's Pro Se response is due to be filed with the Clerk of Court on or before December 4, 2016.

Petitioner now respectfully moves this Honorable Court for a thirty (30) day enlargement of time in which to file his Pro Se Response, thereby extending the time for filing his Pro Se Response until January 3, 2016.

In support of this Motion, Petitioner would respectfully show this Honorable Court the following:

1. Petitioner is unable to research the law or to obtain assistance from persons trained in the law so as to make an adequate response to the Petition For Writ of Certiorari in the time allotted because of the ongoing conditions of confinement at the institution where he is housed.

2. The conditions of confinement include, but are not limited to, random Institutional and/or Unit lockdowns from anywhere between two (2) or three (3) days to five (5) days, due in part to SCDC being short of staff, a policy of randomly locking down Units for something called "Disruptive Lockdowns," and due to the high amount of incidents occurring in some Units.

3. Petitioner reasonably expects that the lockdowns will continue in November, December and January among other things, due to the approaching holiday season.

4. The lock downs substantially interfere with Petitioner's ability and efforts at researching the facts and law regarding this matter, at seeking and obtaining reasonable assistance from inmates trained in the law, and otherwise contribute to the reasons that Petitioner is unable to provide an adequate Pro Se response in a timely manner.

5. Petitioner received the Petition and Appendix from his counsel for the first time on October 27, 2016. See (attached copy of envelope that

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CERTIFICATE OF SERVICE

I, Alexander Lynch, hereby Certify under penalty of perjury that I have on the date shown below, served a true and legible copy of a MOTION FOR ENLARGEMENT OF TIME in the above captioned matter, upon the above named Respondent by hand delivering same to the Lee Corr., Inst., Mail Room Staff/designee for deposit into the U.S. Mail, First Class postage affixed and addressed to the Respondent's counsel of record as follows:

Patrick Schneckpeper, Esquire
Rembert Dennis Building,
1000 Assembly Street, Rm. 519
Columbia, SC 29201

November 4, 2016
Bishopville, South Carolina

Alexander Lynch
Alexander Lynch #341145
Lee Corr., Inst. F6A-1154
990 Wisacky Highway
Bishopville, SC 29010

Petitioner, Pro Se

Alexander Lynch, #341145
Lee Corr., Inst., F6A-1154
990 Wisacky Highway
Bishopville, SC 29010

November 4, 2016

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S.C. SUPREME COURT

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

RE: Alexander Lynch v. State
Appellate Case No. 2016-000516
Motion For Enlargement Of Time
Certificate Of Service

Dear Mr. Shearouse:

Enclosed for filing in the above matter please find a pro se Motion For Enlargement Of Time in which to file a Pro Se Response to Appellate Counsel's Johnson Petition For Writ of Certiorari and a Certificate of Service of same upon Respondent's counsel of record in this matter.

Also enclosed, please find an additional copy of appropriate documents to be clock-stamped and returned to me for my records.

I have enclosed a postage prepaid envelope for your convenience as is customary.

As always, I thank you in advance for your assistance in this matter.

Sincerely,

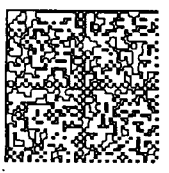
Alexander Lynch

Alexander Lynch

cc: File

ALEXANDER LYNN 391195
LEE E. I. FBK
790 Wesley Hwy
Bristolville SE 27010

DANIEL E. SHEAR HOUSE
Post Office Box 11330
COLUMBIA, SE 29211



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