

THE SUPREME COURT OF SOUTH CAROLINA

Eugene Patterson, Petitioner,

v.

The State of South Carolina, Respondent.

Appellate Case No. 2016-001067

RECEIVED

JAN -9 2017

S.C. SUPREME COURT

**MOTION TO FILE OUT OF TIME AND FOR AN EXTENSION**

Counsel for Petitioner, Elizabeth Franklin-Best, respectfully asks this Court to allow her to file this extension request out of time, and for a brief extension to file the petition for writ of certiorari in this case. The cert petition was due on January 6, 2017. Counsel respectfully asks for a month extension so the brief will be due on Monday, February 6, 2017. Counsel had the brief due in *Quincy Jovan Allen v. State of South Carolina*, Appellate Case No. 2016-000722 on January 4, 2017 and did not have time to complete the cert petition before the due date. Counsel spoke to Clay Mitchell of the Attorney General's Office and he consents.

Respectfully submitted,



Elizabeth A. Franklin-Best  
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SC Bar # 72555  
(803) 765-1044  
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1/9/17  
Columbia, SC.

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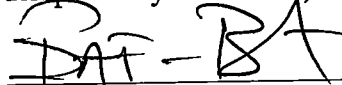
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**CERTIFICATE OF SERVICE**

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I hereby certify that I served a copy of this motion by mailing on this date, 1/9/17 via first class, to Clay Mitchell of the South Carolina Attorney General's Office.

Respectfully submitted,



Elizabeth A. Franklin-Best  
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# BLUME & FRANKLIN-BEST, LLC

## ATTORNEYS AT LAW

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January 9, 2017

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The Honorable Daniel E. Shearouse  
Clerk  
South Carolina Supreme Court  
P.O. Box 11330  
Columbia, S.C. 29211

S.C. SUPREME COURT

VIA HAND DELIVERY

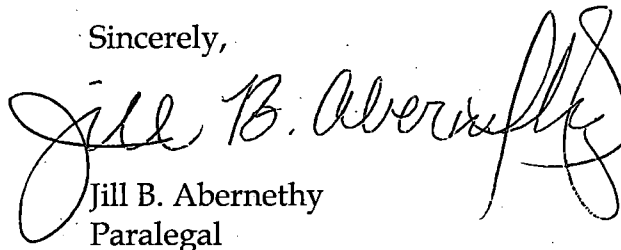
RE: Eugene Patterson v. State of South Carolina  
2016-001067

Dear Mr. Shearouse:

Please find enclosed for filing, with certificate of service, the original and six copies of Petitioner's Motion to File out of Time and Request for an Extension in regards to the above captioned case.

If you should have any questions, please do not hesitate to contact this office.

Sincerely,

  
Jill B. Abernethy  
Paralegal

Enclosure

cc: Clay Mitchell, Esq.