



LAW OFFICE OF
JEREMY A. THOMPSON
LLC

October 5, 2015

RECEIVED

OCT 07 2015

The Honorable Daniel E. Shearouse
Clerk, Supreme Court of South Carolina
P.O. Box 11330
Columbia, SC 29211-1330

S.C. SUPREME COURT

RE: Jaques Jamar Sullivan, #335849 v. State of South Carolina; 2014-002008

Dear Mr. Shearouse:

Enclosed please find the original and one copy of my motion for extension of time in the above-captioned matter. I would appreciate your filing the original motion, clocking the copy, and returning the remaining copy to me in the enclosed self-addressed, stamped envelope. If I can be of any further assistance to the Court in this matter, please do not hesitate to contact me. With my thanks for the Court's assistance in this matter, and my best regards, I am,

Yours sincerely,



Jeremy A. Thompson
Attorney and Counselor at Law

JAT/
Enclosures

cc: Karen Ratigan, Senior Assistant Deputy Attorney General (w/ enclosure)
Jaques Jamar Sullivan, #335849 (w/ enclosure)
Sara Polk (w/ enclosure)

STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas
D. Garrison Hill, Circuit Court Judge

Appellate Case No. 2014-002008
Lower Court Case No. 2012-CP-23-6281

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S.C. SUPREME COURT

JAQUES JAMAR SULLIVAN, #335849,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

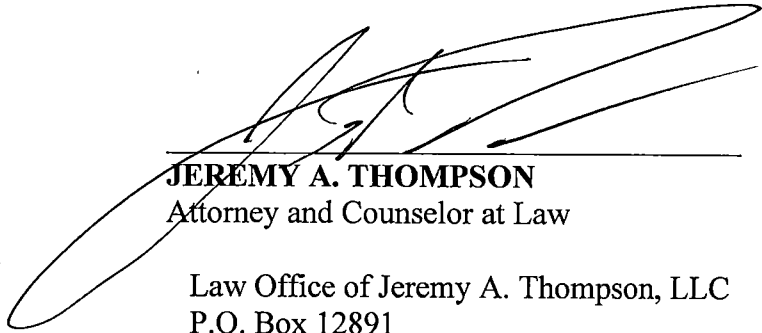
RESPONDENT.

PETITIONER'S MOTION FOR EXTENSION OF TIME

THIS MATTER comes before the Court by way of an appeal from a Post-Conviction Relief Order. The Petition for a Writ of Certiorari and Appendix are due for filing on October 5, 2015. Both the petition and the Appendix have been completed; however, the Appendix is located at undersigned counsel's office on Marion Street in Columbia. Due to the inclement weather conditions in Columbia, undersigned counsel cannot safely travel to his office to obtain the Appendix in order to mail it to the Court. Consequently, undersigned counsel would request a two-day extension of time in which to file these documents on behalf of the Petitioner. Undersigned counsel is also aware of this Court's orders closing all state courts, including this

Court, today, as well as this Court tomorrow; however, there is no provision in either the order or in the South Carolina Appellate Court Rules that provides for automatic extensions of time in the event of the closure of the Court due to inclement weather. Compare Rule 263, SCACR, with Rule 26(a)(3), FRAP. Therefore, in an abundance of caution, undersigned counsel respectfully requests that this Court extend the filing time for these documents to October 7, 2015.¹

Respectfully submitted,



JEREMY A. THOMPSON
Attorney and Counselor at Law

Law Office of Jeremy A. Thompson, LLC
P.O. Box 12891
Columbia, SC 29211
803-779-2555
803-779-2556 FAX
jeremyatlaw@yahoo.com

ATTORNEY FOR PETITIONER.

This 5th day of October, 2015.

¹ Inasmuch as counsel for the Petitioner is a sole practitioner, he has not obtained any additional signatures to this motion. See In re Extension Requests in Criminal Direct Appeals and Post-Conviction Relief Certiorari Proceedings, S.C. Sup. Ct. Order filed March 18, 2009.

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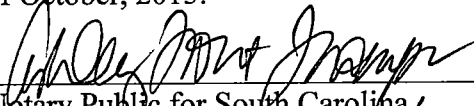
RESPONDENT.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that one copy of the Petitioner's Motion for Extension of Time in the above-entitled case has been served upon opposing counsel, Karen Ratigan, Senior Assistant Deputy Attorney General, Office of the Attorney General, P.O. Box 11549, Columbia, SC 29211, by depositing in the U.S. mail with proper postage, this 5th day of October, 2015.


JEREMY A. THOMPSON
ATTORNEY FOR THE PETITIONER

SWORN TO BEFORE me this 5th day
of October, 2015.

 (L.S.)
Notary Public for South Carolina
My Commission Expires: 2/22/18

LAW OFFICE OF
JEREMY A. THOMPSON
LLC

P.O. Box 12891, Columbia, SC 29211

The Honorable Daniel E. Shearouse
Clerk, Supreme Court of South Carolina
P.O. Box 11330
Columbia, SC 29211-1330



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FOREVER



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