



THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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OCT 10 2017

APPEAL FROM GEORGETOWN COUNTY  
Court of Common Pleas  
Post Conviction Relief

S.C. SUPREME COURT

John C. Hayes, Circuit Court Judge

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Appellate Case No.: 2017-00828

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John Jabbar Greene #219696,..... Petitioner,

vs.

State of South Carolina, .....Respondent.

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CONSENT MOTION FOR EXTENSION

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Comes now, Tommy A. Thomas, Counsel for Petitioner, respectfully requesting a thirty (30) day extension of time to file the Petition for Writ of Certiorari and Appendix in the above referenced matter.

This extension request is not intended for the purpose of delay. Rather, this extension request is necessitated by a heavy workload and is for good cause. In the past three weeks I have had the following

- 1) parole hearings
- 2) Two Administrative Law Court Briefs,
- 3) Prepared a 59(e) Motion and a Petition for Declaratory Judgment and Injunctive Relief and prepared for a Motion to request Credit against sentence while on Home Detention Pursuant to §24-13-40 hearing.

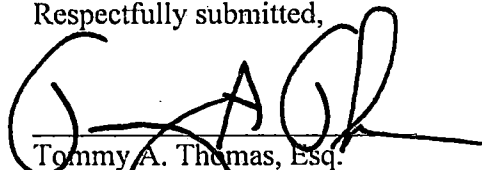
4) A PCR trial in Horry County

5) Civil mediation

I would respectfully request an extension of time of thirty (30) days, in which to prepare and file the Petition for Writ of Certiorari and Appendix. I do not anticipate the necessity for any further request for extension.

The Office of the Attorney General does not oppose this extension request.

Respectfully submitted,



Tommy A. Thomas, Esq.

SC Bar No.: 5536

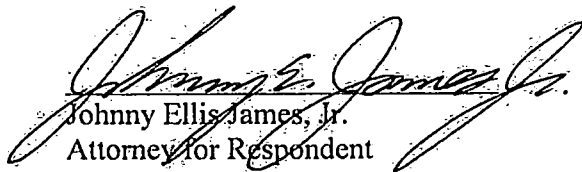
P.O. Box 88

Irmo, SC 29063

(803) 732-5507

Oct. 5, 2017

I consent,



Johnny Ellis James, Jr.  
Attorney for Respondent

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John Jabbar Greene #219696,..... Appellant,

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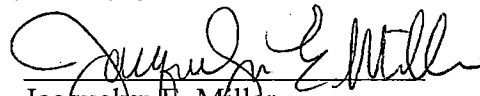
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CERTIFICATE OF SERVICE

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I, Jacquelyn E. Miller, secretary to Tommy A. Thomas, Attorney for the Appellant hereby certify that I placed in the United States Mail, a copy of a Motion for Extension, with postage prepaid and the return address clearly shown on said envelope to Johnny James, Jr., Esq. of the Attorney General's Office, at:

Johnny James, Jr., Esq.  
Attorney General's Office  
P.O. Box 11549  
Columbia, SC 29211-1549

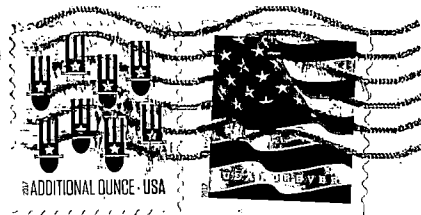


Jacquelyn E. Miller  
Secretary to Tommy A. Thomas  
Attorney for Applicant  
P.O. Box 88  
Irmo, SC 29063  
(803) 732-5507

October 5, 2017

Tommy A. Thomas, P.C.  
ATTORNEY AND COUNSELOR AT LAW  
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The South Carolina Supreme Court  
Clerk, Daniel Shearouse  
P.O. Box 11330  
Columbia, SC 29211

29211-11330

