

# PARHAM

PARHAM LAW FIRM, LLC

November 8, 2017

**RECEIVED**  
NOV 13 2017  
S.C. SUPREME COURT

VIA U.S. MAIL

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

**RE: Thomas Edward Davis, Petitioner, v.  
State of South Carolina, Respondent.**

**Appellate Case No. 2017-000105**

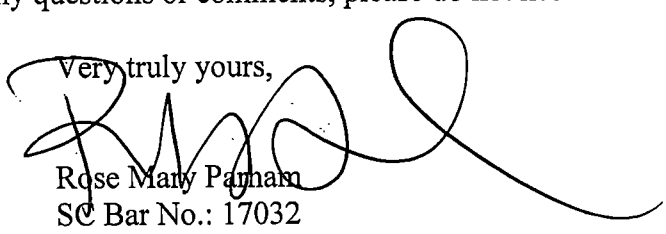
**Motion for Extension of Time to File Petition for Writ  
of Certiorari and Appendix**

Dear Clerk of Court:

Enclosed please find the original and one (1) copy of a Motion for Extension of Time to File Petition for Writ of Certiorari in the above referenced case along with a certificate of service which is being forwarded to you for filing. We would respectfully request that you send a clocked copy back in the return envelope I have provided. I thank you in advance for your kind attention to this matter.

By copy of this letter, I am serving opposing counsel, Lindsey McCallister, Esquire, with a copy of the same. Should you have any questions or comments, please do not hesitate to contact me.

Very truly yours,

  
Rose Mary Parham  
SC Bar No.: 17032

RMP/lm

Enclosures

cc: Lindsey McCallister, Esq.;  
Thomas E. Davis

PO Box 1514 Florence SC 29503  
541 W. Evans St Florence SC 29501  
p 843.407-7757 f 843.407.7758 parhamlaw@sc.twcbc.com

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Florence County

**RECEIVED**

NOV 13 2017

Honorable Edgar W. Dickson, Circuit Court Judge **SC SUPREME COURT**

THOMAS EDWARD DAVIS

PETITIONER,

V.

STATE OF SOUTH CAROLINA

RESPONDENT.

APPELLATE CASE NO. 2017-000105

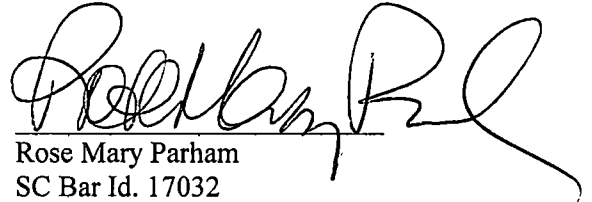
MOTION FOR EXTENSION OF TIME TO FILE PETITION FOR WRIT OF  
CERTIORARI AND APPENDIX

This Motion comes before the Court pursuant to Rule 243(b) of the South Carolina Rules of Court. Petitioner requests a 60 day extension of time to to file Petition for Writ of Certiorari and Appendix in the instant case.

This motion is based on the following facts. The undersigned has just recently been substituted as Counsel of Record for Petitioner on October 12, 2017. Subsequently, the undersigned has requested the PCR evidentiary hearing transcripts from the court reporter, as evidenced by the attached correspondence. The undersigned needs these transcripts to prepare the Petitioner's Writ for Certiorari. Pursuant to the undersigned's communication with the court reporter, it is belived that she will obtain the requeusted transcripts in the coming days.

The undersigned has spoken with opposing counsel, Lindsey McCallister, Esquire, who stated that she has no objection to the Petitioner's Motion for Extension of Time. It is therefore requested of this Honorable Court that an extension of time to File Petition of Writ of Certiorari and Appendix be ordered.

[SIGNATURE TO FOLLOW]



Rose Mary Parham

SC Bar Id. 17032

Parham Law Firm, LLC

P.O. Box 1514

Florence, SC 29503

Phone: (843) 407-7757

Fax: (843) 407-7758

[rosemaryparham@sc.rr.com](mailto:rosemaryparham@sc.rr.com)

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion for Substitution of Counsel was served on counsel for the following this 8<sup>th</sup> day of November, 2017, via U.S. mail, postage prepaid, at the following addresses:

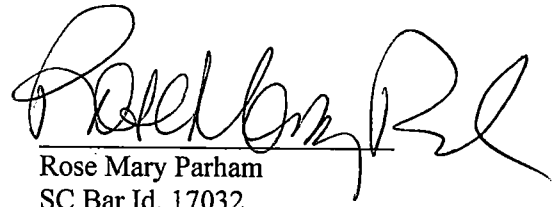
Lindsey McCallister, Esq.  
Assistant Attorney General  
SC Attorney General's Office  
P.O. Box 11549  
Columbia, SC 29211

Thomas E. Davis  
SCDC ID: 00351299  
Broad River Correctional Institution  
4460 Broad River Road  
Columbia, SC 29210

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S.C. SUPREME COURT



Rose Mary Parham  
SC Bar Id. 17032  
Parham Law Firm, LLC  
P.O. Box 1514  
Florence, SC 29503  
Phone: (843) 407-7757  
Fax: (843) 407-7758  
[rosemaryparham@sc.rr.com](mailto:rosemaryparham@sc.rr.com)

## Lawton Matthews

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**From:** Smith, Krystal J. <krsmith@sccourts.org>  
**Sent:** Wednesday, November 8, 2017 8:21 AM  
**To:** Lawton Matthews  
**Subject:** Re: Request for Transcript

?I have received your request and will get the transcript to you shortly. I believe it has already been done and I will get a copy over to you this week.

Krystal J. Smith

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**From:** Lawton Matthews <parhamsupport@sc.rr.com>  
**Sent:** Tuesday, November 7, 2017 5:55 PM  
**To:** Smith, Krystal J.  
**Subject:** Request for Transcript

Ms. Smith,

I am contacting you on behalf of Mrs. Rose Mary Parham who has been retained to represent Mr. Thomas Edward Davis. Mrs. Parham would like to request the transcripts from Mr. Davis's PCR evidentiary hearing which was held on October 9, 2014, before the Honorable Edgar W. Dickson, in the Florence County Complex. It is our understanding that you were the Court reporter for that proceeding. (Case No: 2013-CP-21-0846) Mrs. Parham is more than happy to pay your additional fee for expediting this request if you are able to accommodate it. Please let us know if you have received this message and if there is anything further you need from our office.

I would like to thank you in advance for your time and kind consideration in this matter. Should you have any questions or concerns, please do not hesitate to contact me.

Very truly yours,

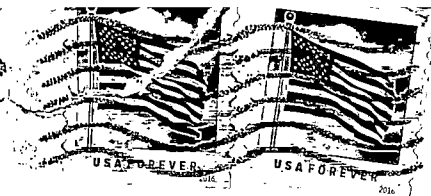
Lawton S. Matthews  
Parham Law Firm, LLC  
P.O. Box 1514  
Florence, SC 29503  
Telephone: (843) 407-7757  
Facsimile: (843) 407-7758

~~~ CONFIDENTIALITY NOTICE ~~~ This message is intended only for the addressee and may contain information that is confidential. If you are not the intended recipient, do not read, copy, retain, or disseminate this message or any attachment. If you have received this message in error, please contact the sender immediately and delete all copies of the message and any attachments.

**Parham Law Firm, LLC**  
**Post Office Box 1514**  
**Florence, SC 29503**

**COLUMBIA SC 290**

**08 NOV 2017 PM 11**



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

**29211-133030**

