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THE STATE OF SOUTH CAROLINA  
In the Supreme Court

AUG 26 2016

CERTIORARI TO THE COURT OF APPEALS <sup>S.C.</sup> SUPREME COURT  
Appeal from Spartanburg County  
The Honorable J. Derham Cole, Post-Conviction Relief Judge

Opinion No. 5372 (S.C. Ct. App. Filed December 30, 2015)

Appellate Case 2016-000610

Farid A. Mangal,

Respondent,

v.

State of South Carolina,

Petitioner.

MOTION TO RECONSIDER AND/OR TO EXTEND  
THE TIME TO FILE RESPONSIVE BRIEFS

TO: THE PETITIONER AND YOUR COUNSEL AND COUNSEL FOR THE AMICI  
CURIAE

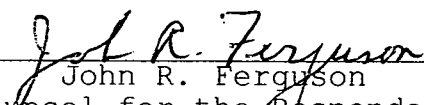
YOU WILL PLEASE TAKE NOTICE that the undersigned is moving the Court to reconsider its denial (received today) of his Motion to Be Relieved as Counsel and/or to extend his deadline for responding to the Petitioner's and the amici curiae briefs by thirty days. The undersigned is scheduled to have (and has paid for) a three week foreign vacation beginning on the 26<sup>th</sup> of this month. (See attached order of protection.) He further will have oral surgery on August 25<sup>th</sup>. This means that he will have almost no time to draft and file a responsive brief.

JR7  
P-1

The undersigned is informed and believes that the Respondent has engaged C. Rauch Wise, Esq., of Greenwood as his new counsel and that the only delay is in transferring money from the Respondent's account with the SCDC to Mr. Wise in payment for his services. The request for the transfer has already been made.

Respondent is entitled to the effective assistance of counsel and to due process. He will receive neither if the Court does not grant the requested relief. The Respondent will continue to reside in prison during the appeal, so there is no prejudice to the State or to the amici curiae.

JR7  
P.2

  
\_\_\_\_\_  
John R. Ferguson  
Counsel for the Respondent  
S.C. Bar No. 1987  
P.O. Box 286  
Laurens, S.C. 29360  
(864) 984-2126

August 23, 2016

CC: C. Rauch Wise, Esq.

COX FERGUSON AND WHAM, LLC LYNN W. LANCASTER  
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ALLEN M. WHAM

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E-MAIL: jferg@backroads.net

2016 AUG 12 P 2:50

August 10, 2016

The Hon. Frank R. Addy, Jr.  
Circuit Court Judge  
528 Monument St., Rm. 210  
Greenwood, SC 29646

LAURENS COUNTY  
CLERK OF COURT

Re: Vacation Protection

Dear Judge Addy:

The stars have finally aligned so that I can take a vacation. I ask to be protected for the period August 26 through September 16. I hope that this will be satisfactory.

Sincerely,

*John R. Ferguson*  
John R. Ferguson

JRF/wp

*Protection granted.*

*Fulmer*  
8-11-16

A TRUE COPY OF ORIGINAL

*Lynn W. Lancaster*  
Lynn W. Lancaster  
Laurens County CCCP & GS

**COX FERGUSON AND WHAM, LLC**

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October 11, 2016

Office of the Clerk of Court  
S.C. Supreme Court  
P.O. Box 11330  
Columbia, SC 29211

ATTN.: Linda

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OCT 14 2016

S.C. SUPREME COURT

Re: Mangal v. State, 2016-000610

Dear Linda:

During our conversation I came to understand what the problem is with the Mangal motion. It is not that you are missing a page; it is that you do not have the final version of the second page. I am enclosing a copy of what you should have. I regret the confusion.

Sincerely,

*John R. Ferguson*  
John R. Ferguson

JRF/wp  
Encl.

COX, FERGUSON & WHAM, LLC

Attorneys at Law

PO Box 286

Laurens SC 29360-0286

GREENVILLE SC 296

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