

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM ABBEVILLE COUNTY
Court of General Sessions
Frank R. Addy, Jr., Circuit Court Judge

RECEIVED

OCT 31 2018

Appellate Case No. 2018-000495

SC Court of Appeals

Charles Tillman,..... Appellant.

v.

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

Petition to Extend Time to File Initial Brief of Appellant and Designation of Matter to be Included in the Record on Appeal

Charles Tillman petitions this Court for an order extending time to file the Initial Brief of Appellant and Designation of Matter to be Included in the Record on Appeal. This petition is based on the following grounds.

1) This request is based on counsel's workload and is not intended for delay. Counsel's petition dated September 28, 2018 set forth counsel's workload throughout the summer, which included a capital PCR hearing in *Jerry Inmon v. State of South Carolina*, Pickens County Case No. 2012-CP-39-00918, tried August 20-23, 2018, and preparing for the evidentiary hearing in *Stephen Cory Bryant v. State*, Sumter County Case No. 2016-CP-43-00828, also a capital PCR case, tried on October 1, 2018.

2) Counsel's workload in the past week included, in *State v. Preston Shands, Jr.*, Appellate Case No. 2018-001673, a case involving cross-appeals, pursuant to the Supreme Court's expedited procedure in petitions for writs of *certiorari* to review

opinions of the Court of Appeals, filing a return to the State's petition for a writ of *certiorari* and a reply to the State's return to Mr. Shands' petition for a writ of *certiorari*. Counsel also filed the Rule 59(e), FRCP motion in *Mahdi v. Stirling*, Civil Action No. 8:16-3911-TMC, a capital federal *habeas corpus* case, and is preparing objections to the State's proposed order in *Bryant v. State*, the capital PCR case tried on October 1, 2018, which are due on Friday, November 2, 2018.

3) As set forth in the petition dated September 28, 2018, after the hearing in Mr. Bryant's case was completed, counsel blocked time to work on this brief. The trial transcript is 716 pages. The current draft is 26 pages and includes six issues. Counsel plans to complete the draft within the next week, to be followed by a review and editing process. Counsel anticipates completing this process without need for additional extensions.

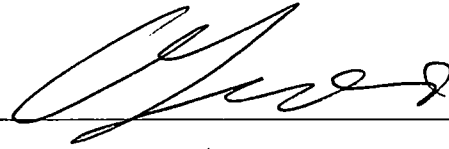
Therefore, Mr. Tillman respectfully requests this Court issue an order extending time to file the Initial Brief of Appellant and Designation of Matter to be Included in the Record on Appeal until Wednesday, November 28, 2018.

IT IS SO MOVED.

(signature on next page)

Respectfully Submitted,

By



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Attorney for the Appellant

October 29, 2018
Greenwood, South Carolina

THE STATE OF SOUTH CAROLINA
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Appellate Case No. 2018-000495

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Certificate of Service

I certify that I have served this pleading on the State of South Carolina by placing a copy in the United States Mail, postage prepaid, on the date reflected below, addressed as follows:

Melody J. Brown, Esquire
S.C. Attorney General's Office
PO Box 11549
Columbia, SC 29211



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October 29, 2018

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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SC Court of Appeals

Re: *State of South Carolina v. Charles Tillman*
Appellate Case Number 2018-000495

Dear Ms. Kitchings:

Enclosed please the original and six copies of Mr. Tillman's Petition to Extend Time to File Initial Brief of Appellant and Designation of Matter to be Included in the Record on Appeal, along with a certificate of service.

Thank you for your attention to this matter. Please let me know if I can answer any questions or provide additional information.

With kindest regards, I am

Yours very truly,


E. Charles Grose, Jr.

cc: Melody J. Brown, Esquire

The Grose Law Firm, LLC
404 Main Street
Greenwood, SC 29646



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The Honorable Jenny Abbott Kitchings
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