

**The Grose Law Firm, LLC**  
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March 4, 2019

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

**RECEIVED**

**MAR 06 2019**

**S.C. SUPREME COURT**

Re: *Sammie Lee Gerrick v. State of South Carolina*  
Appellate Case Number 2018-001629

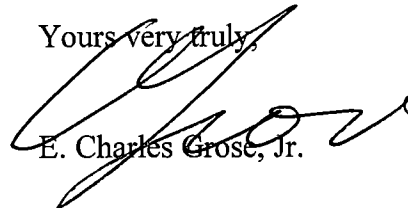
Dear Mr. Shearouse:

Enclosed please find Mr. Gerrick's petition to extend time to file the petition for writ of certiorari and appendix, along with a certificate of service.

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

With kindest regards, I am

Yours very truly,



E. Charles Grose, Jr.

cc: Julie A. Coleman, Esquire

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

**RECEIVED**

MAR 06 2019

APPEAL FROM BARNWELL COUNTY  
Court of Common Pleas  
R. Scott Sprouse, Circuit Court Judge

S.C. SUPREME COURT

Appellate Case No. 2018-001629

Sammie Lee Gerrick, ..... Petitioner,

v.

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

**Petition to Extend Time to File Petition for Writ of Certiorari**

Sammie Lee Gerrick petitions this Court for an extension to Wednesday, April 3, 2019 to file his petition for writ of *certiorari* and appendix. Counsel has a state-wide trial, appellate, and post-conviction practice that required counsel to travel within and outside the state during December. Undersigned counsel has been working on this case but has not had time to draft the brief since receiving the corrected transcript. This request is based on undersigned counsel's workload and is not intended for delay. Since the beginning of 2019, counsel's other professional obligations have included:

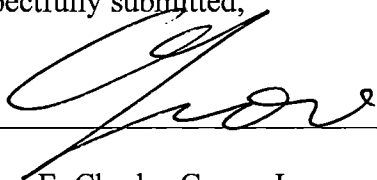
- a) Counsel attended a court ordered mediation on January 14, 2019 in *Coats v. Pope, et. al.*, Case No. 1:17-cv-02930-TLW-SVH (a wrongful death case); counsel also attended depositions in this case on January 29, 30, and 31, 2019 and February 19, 2019;
- b) Counsel participated in a day long trial on January 16, 2019 in *Katie Harris v. State*, Spartanburg County Case No. 2017-CP-42-02140 (PCR in homicide by child abuse case);

- c) Counsel participated two day trial on January 22-23, 2019 in *State v. Jared Waning* (SC National Guard Court-Martial);
- d) Counsel participated in the evidentiary hearing on January 24, 2019 in *Curtis Elgin v. State*, Fairfield County Case No. 2012-CP-20-00232 (PCR in murder case);
- e) Counsel prepared for and participated in an oral argument in this Court on February 5, 2019 in *State v. Edward Dean*, Appellate Case No. 2016-001004;
- f) Counsel filed the Initial Brief of Appellant on February 8, 2019 in *Quincy Allen v. S.C. Department of Corrections*, Appellate Case No. 2018-002046; and
- g) Counsel is preparing for a date certain jury trial scheduled to begin on March 4, 2019 in *State v. Joshua Eric Parham*, a Greenwood County first-degree criminal sexual conduct with a minor case.

This extension is necessary for counsel to effectively brief the issues in this appeal. See *Smith v. Robbins*, 528 U.S. 259 (2000), *Evitts v. Lucey*, 469 U.S. 387, 396 (1985); see also *Patrick v. State*, 349 S.C. 203, 562 S.E.2d 609 (2002), *Southerland v. State*, 337 S.C. 610, 524 S.E.2d 833 (1999). Counsel plans to complete this pleading after the March 4, 2019 trial.

IT IS SO MOVED.

Respectfully submitted,

By 

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*Attorney for Sammie Gerrick*

March 3, 2019  
Greenwood, South Carolina

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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APPEAL FROM BARNWELL COUNTY  
Court of Common Pleas  
R. Scott Sprouse, Circuit Court Judge

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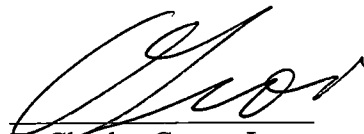
**Certificate of Service**

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I certify that I have served a copy of this pleading on the State of South Carolina by placing a copy in the US Mail, postage prepaid, on the date reflected below, addressed to

Julie A. Coleman, Esquire  
S.C. Attorney General's Office  
PO Box 11549  
Columbia, SC 29211-1549

March 3, 2019, 2019



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