

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

SEP 16 2019

Appellate Case No. 2018-000495

SC Court of Appeals

Charles Tillman,..... Appellant.

v.

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

Petition to Extend Time to File Record on Appeal

Mr. Tillman petitions this Court for an order extending time to file the Record on Appeal to Monday, October 14, 2019. This is the first request for an extension to file this pleading. This request is based on counsel's workload and is not intended for delay. Counsel prepared for and tried trial of *State v. Ernesto Jimenez*, Case No. 2015-A24-201-00559, a criminal second-degree sexual conduct with minor prosecution, August 19-21, 2019. Undersigned counsel also filed an Initial Reply Brief in the Court of Appeals in *State v. Charles Dent*, Appellate Case No. 2018-001257, on August 19, 2019, and a reply to the State Response to a Petition for Writ of *Certiorari* in our Supreme Court in *Gerrick v. State*, Appellate Case No. 2018-001629, on September 12, 2019. Counsel is also preparing an opening brief in *Mahdi v. Stirling*, Case No. 19-3, a capital federal habeas case pending in the United States Court of Appeals for the Fourth Circuit. Counsel will block time on his calendar to complete this task.

IT IS SO MOVED.

Respectfully Submitted,

By  _____

E. Charles Grose, Jr.
S.C. Bar Number 66063
The Grose Law Firm, LLC
404 Main Street
Greenwood, SC 29646
(864) 538-4466
(864) 538-4405 (fax)
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Attorney for the Appellant

September 13, 2019
Greenwood, South Carolina

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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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Greenwood, SC 29646
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September 13, 2019
Greenwood, South Carolina

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Web: GroseLawFirm.com

September 13, 2019

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

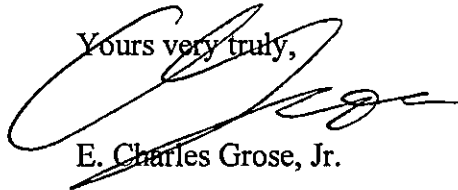
Dear Ms. Kitchings:

Enclosed please find Mr. Tillman's Petition to Extend Time to File 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 Grosse Law Firm, LLC
404 Main Street
Greenwood, SC 29646



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