

THE STATE OF SOUTH CAROLINA
In The Supreme Court

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Feb 22 2021

S.C. SUPREME COURT

APPEAL FROM PICKENS COUNTY
Court of Common Pleas
Alexander S. Macaulay, Circuit Court Judge

Appellate Case No. 2020-000881

Jerry Buck Inman a/k/a Jerry Buck Inmon,Respondent-Petitioner,

v.

State of South Carolina,Petitioner-Respondent.

Motion for Extension of Time to File Return to State's Petition for Writ of *Certiorari*

In this capital case, Jerry Inmon¹ moves this Court for an order extending the time to file return to the State's petition for a writ of *certiorari* by two days until Wednesday, February 24, 2021. This motion is Mr. Inmon's fifth and final request to extend time to file his response to the State's petition for a writ of *certiorari* since this Court's order dated August 24, 2020 appointing undersigned counsel.²

¹ "Inmon" is the correct spelling. Mr. Inmon's name appears as "Inman" in prior proceedings and some pleadings in the proceedings in the court below.

² By letter dated July 16, 2020, undersigned counsel joined the State's requests to hold in abeyance filing deadlines or, alternatively, grant an extension until this Court ruled on the motion to appoint counsel.

On October 23, 2020, Mr. Inmon filed a motion for an order requiring the State of South Carolina to file a Supplemental Appendix to include in the Appendix copies Applicant's Exhibits 47-54, which are deposition transcripts introduced during the evidentiary hearing. This Court granted that motion on November 25, 2020, and the State filed the supplemental appendix on November 19, 2020.

This request is not intended for delay. Ms. Holt continues struggling with grief from the loss of her eldest child. In the last week, Mr. Grose has been preparing for and conducting depositions in *Cottrell v. State*, Case No. 2018-CP-26-05709, a capital post-conviction relief case, on February 18 and 22, 2021. On February 18, 2018, he filed a Response in Opposition to the State's Motion for Summary Judgement in *Lopez v. Williams*, C/A No. 4:20-3777-BHH-TER. He prepared for and participated in the evidentiary hearing in *Rice v. State*, Case No. 2018-CP-10-06102, on February 19, 2021 via WebEx.

Having filed the cross-petition for a writ of *certiorari*, counsel for Mr. Inmon have concentrated on filing the return to the State's petition for a writ of *certiorari*. Counsel are circulating a near final draft and respectfully request another two days to complete the pleading.

Prior to filing this motion, undersigned counsel communicates with opposing counsel who states the State does not oppose this request.

Respectfully Submitted,

By s/E. Charles Grose, Jr.

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