

IN THE SUPREME COURT OF THE UNITED STATES

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No.

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WILLIAM BRUCE JUSTICE,

Petitioner

v.

STATE OF SOUTH CAROLINA,

Respondent

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APPLICATION FOR EXTENSION OF TIME IN WHICH  
TO FILE PETITION FOR WRIT OF CERTIORARI

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To the Honorable John G. Roberts, Jr., Chief Justice of the United States and Circuit Justice for the Fourth Circuit:

Petitioner William Justice prays that an order be entered extending the time for filing the petition for a writ of certiorari for a period of thirty (30) days to and including April 11, 2024. This application is submitted more than ten days prior to the scheduled filing date for the petition.

William Justice was indicted in February 1989 for four counts of burglary in the second degree, two counts of grand larceny, and two counts of petit larceny. He was found guilty as indicted and sentenced to fifteen years' imprisonment on each of the burglary charges, twenty years on the grand larceny charges, and one month on each of the petit larceny charges. The burglary sentences were crafted to run consecutive to one another, and the remaining sentences ran concurrently. In total, Mr. Justice received a sixty-year aggregate sentence.

On or about May 2, 2012, Mr. Justice was granted parole. His parole was revoked following a hearing in October 2013. The subject of this appeal is the parole revocation process.

Mr. Justice filed a timely application for post-conviction relief under South Carolina's Uniform Post-Conviction Procedure Act. S.C. Code Ann. § 17-27-10 *et seq.* An evidentiary hearing occurred on February 1, 2017, and an Order of Dismissal was filed on August 2, 2017.

The undersigned represented Mr. Justice as his case made its way through both of South Carolina's appellate courts. The Court of Appeals issued its opinion on May 4, 2022; the South Carolina Supreme Court issued its opinion on December 13, 2023. Justice v. State, 441 S.C. 623, 896 S.E.2d 319 (2023). Accordingly, the petition for writ of certiorari is due with this Court on March 12, 2024.

Mr. Justice will invoke this Court's jurisdiction under 28 U.S.C. § 1257(a). The following issues of constitutional law will be presented for review:

Whether South Carolina's appellate courts failed to apply an exception to the mootness doctrine, where, as a result of an unconstitutional parole revocation hearing, Justice has a parole violation on his criminal record, where the blatantly illegal procedures employed by the South Carolina Department of Probation, Parole and Pardon Services are the standards by which they treat every unrepresented, indigent individual in South Carolina, where the remedy for future violations proposed by the state courts—filing a PCR application—was followed in this case yet failed to yield appellate review due to perceived mootness, and where a current South Carolina statute is unconstitutional based on longstanding United States Supreme Court precedent?

The undersigned was previously an Appellate Defender at the South Carolina Commission on Indigent Defense, a state agency. Most of the representation in this case occurred while employed in this capacity. In April 2023, the undersigned became the Pro Bono Director at the University of South Carolina School of Law. With the consent of Mr. Justice, representation has continued uninterrupted. This extension of time is requested because the job

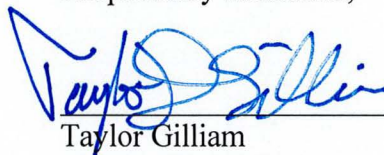
responsibilities at the law school are extensive and demanding. Due to these commitments, counsel has not yet had the opportunity to finalize the petition. Research and drafting have begun, but additional time is needed to properly present Mr. Justice's federal constitutional claims to this Court.

Petitioner's counsel, Taylor D. Gilliam, is the Pro Bono Director at the University of South Carolina School of Law. In this capacity, counsel organizes monthly wills clinics across the state, where volunteer attorneys and law students assist members of the public with both wills and healthcare powers of attorney. Counsel also assists with expungement drives, driver's license reinstatement efforts, homeless shelter legal clinics, and an upcoming name change clinic. Counsel is also the President of the South Carolina Bar Young Lawyer's Division and has numerous meetings, assignments, and travel obligations associated with this leadership position.

Counsel has consulted with the attorney currently representing the State of South Carolina, Matthew Buchanan, concerning this extension. Mr. Buchanan confirmed that he does not oppose this request for an extension.

WHEREFORE, Petitioner requests an order extending the time for filing his petition for a writ of certiorari for thirty days to and including April 11, 2024.

Respectfully submitted,



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Attorney for Petitioner

February 28, 2024