

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Pickens County
D. Garrison Hill, Circuit Court Judge

RECEIVED

MAY 28 2013

S.C. Supreme Court

JAMES MICHAEL DOVER,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2012-212588

MOTION FOR AN EXTENSION OF TIME
IN WHICH TO FILE THE PETITION FOR WRIT OF
CERTIORARI AND APPENDIX

Counsel for James Michael Dover respectfully requests a **final thirty (30) day extension, until June 27, 2013**, in which to file the petition for writ of certiorari and appendix in this case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. This is a third request for an extension. In support of this request, counsel shows:

1. The petition for writ of certiorari and appendix are due to be filed with the Court today, May 28, 2013. The Court has granted counsel two previous extensions.
2. Counsel for Mr. Dover respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions

previously granted and the order in which counsel attempts to manage her caseload, counsel hopes that no further extension requests will be required.

3. Counsel filed a petition for writ of certiorari to the Court of Appeals in the case of The State v. Ralph Bernard Coleman with the Supreme Court on May 23, 2013. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Titus Bantan v. State of South Carolina with the Supreme Court on May 23, 2013. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Devin Gantt v. State of South Carolina with the Supreme Court on May 22, 2013. Counsel filed a return to petition for writ of certiorari to the Court of Appeals in the case of The State v. Christopher Broadnax with the Supreme Court on May 21, 2013. Counsel filed the Petition for Rehearing in the case of The State v. Anthony Martin with the Court of Appeals on May 16, 2013. Counsel had an oral argument in the case of The State v. Anthony Tilmon with the Court of Appeals on May 15, 2013. Counsel filed the Initial Brief of Appellant in the case of The State v. Benjamin J. Jackson with the Court of Appeals on May 13, 2013. Counsel had an oral argument in the case of The State v. David N. Rhoad in the Court of Appeals on May 8, 2013. Counsel had an oral argument in the case of The State v. Michael Milledge in the Court of Appeals on May 6, 2013. Counsel filed the Petition for Writ of Certiorari and accompanying appendix in the case of Jovon Brown v. The State of South Carolina with the Supreme Court on May 1, 2013. Counsel filed the Petition for Rehearing in the case of The State v. Eugene D. Patterson with the Court of Appeals on May 1, 2013. Counsel filed the Johnson Petition for Writ of Certiorari in the case of Giles Belcher v. State of South Carolina with the Supreme Court on April 24, 2013. Counsel filed the Johnson Petition for Writ of Certiorari in the case of Jeremy J. Jeter v. State of South Carolina with the Supreme Court on April 24, 2013. Counsel filed the Brief of Petitioner in the case of In

the Matter of the Care and Treatment of Gilbert Gonzalez in the Supreme Court on April 23, 2012. Counsel filed the Brief of Petitioner and the Brief of Respondent in the case of In the Matter of Care and Treatment of Vince Neal Way in the Supreme Court on April 23, 2013. Counsel filed the petition for rehearing in the case of State v. Alonza Dennis in the Court of Appeals on April 18, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Justin Nelson v. State with the Supreme Court on April 15, 2013. Counsel had an oral argument in the case of State v. Ronald Gooden in the Court of Appeals on April 10, 2013. Counsel had an oral argument in the case of State v. John Mack with the Court of Appeals on April 9, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Christopher O'Neal Pringle v. State in the Supreme Court on April 3, 2013. Counsel had an oral argument in the case of State v. David Jakes with the Court of Appeals on April 3, 2013. Counsel had an oral argument in the case of State v. Anthony Martin in the Court of Appeals on April 3, 2013. Counsel had an oral argument in the case of State v. Clarence Logan, Jr. with the Supreme Court on April 2, 2013. Counsel had an oral argument in the case of State v. Eugene Patterson in the Court of Appeals on April 1, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Alfred Redwine v. State with the Supreme Court on March 27, 2013.

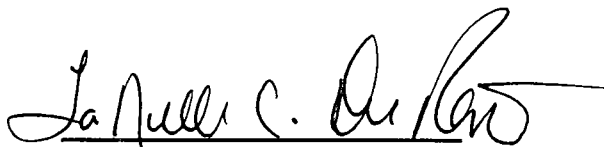
4. Counsel makes this request in good faith and not for purpose of delay.

5. Counsel for the Attorney General's office consents to this request as shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until June 27, 2013**, in which to file the petition for writ of certiorari and

appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,



LaNelle C. Durant
Appellate Defender

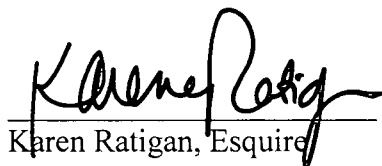
Attorney for Petitioner.



Robert M. Dudek
Chief Appellate Defender

This 28th day of May, 2013.

I consent:


Karen Ratigan, Esquire