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Oct 20 2023

S.C. SUPREME COURT

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Cherokee County

Honorable Daniel D. Hall, Circuit Court Judge

FRANKLIN DOVER,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2023-000537

MOTION FOR AN EXTENSION TO SERVE AND FILE
THE PETITION FOR WRIT OF CERTIORARI
AND APPENDIX

Counsel for Franklin Pierre Dover respectfully requests a **final thirty (30) day extension, from October 20, 2023 until November 20, 2023** in which to serve and 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 served and filed with the Court today.
2. Counsel for Franklin Pierre 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.

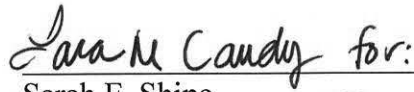
3. Counsel filed the Anders Brief of Appellant and Designation of Matter in the case of The State v. Henry Wayne Parker with the Court of Appeals on October 11, 2023. From October 9, 2023 through October 11, 2023, counsel attended the Annual Public Defender Conference. Counsel filed the Petition for Writ of Certiorari, Brief of Appellant Pursuant to White v. State, and the Appendix in the case of Brian Foster v. State with the Supreme Court on October 3, 2023. Counsel filed the Brief of Petitioner in the case of Raphael L. Pontoo v. The State with the Court of Appeals on September 18, 2023. Counsel filed the Return to the Petition for Rehearing in the case of The State v. Carmie Josette Nelson with the Supreme Court on September 8, 2023. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Narkevious M. Reid with the Court of Appeals on September 6, 2023. Counsel filed the Petition for Writ of Certiorari and Appendix in the case of Christopher Campbell v. The State with the Supreme Court on August 25, 2023.

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

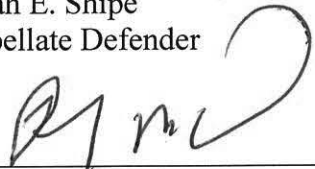
5. On October 3, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through October 31.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension from October 20, 2023 until November 20, 2023** in which to serve and 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 for Writ of Certiorari and Appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Sarah E. Shipe
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 20th day of October, 2023.