

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Appeal from Chester County

The Honorable Ernest J. Kinard, Circuit Court Judge

WILLIAM DAVID DOVE,

PETITIONER,

V.

THE STATE,

RESPONDENT.

Appellate Case No. 2013-002465

**PETITION TO FILE PETITION FOR THE WRIT OF CERTIORARI OUT OF
TIME AND PETITION FOR EXTENSION OF TIME TO FILE THE WRIT OF
CERTIORARI AND APPENDIX**

Petitioner through his Counsel, Tristan M. Shaffer, respectfully requests to file the Petition for Writ of Certiorari and Appendix out of time and have his time limit for filing these documents extended until August 8, 2014. In support of this motion, counsel would show the Court the following:

1. The transcript of the PCR hearing was mailed to Counsel's Lexington Office on May 23, 2014. Counsel would have received this document on or about May 27, 2014.
2. Counsel accepted a position with Axelrod and Associates beginning June 2, 2014. Counsel inadvertently misplaced the transcript while preparing to move to his new office.
3. As a result counsel failed to properly notify the Court that he had received the transcript or schedule the filing.
4. Counsel regrets this unintentional delay.
5. This request is made in good faith, and not for purposes of delay.

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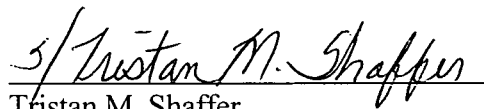
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S.C. SUPREME COURT

6. Counsel has attempted to contact Suzanne White of the Attorney General's Office to obtain her consent; however, has been unable to reach her.

WHEREFORE, the undersigned counsel would respectfully requests to file the Petition for Writ of Certiorari and Appendix out of time and have his time limit for filing these documents extended until August 8, 2014. Counsel requests that the time limits be held in abeyance pending a ruling on this motion.

Respectfully submitted,

A handwritten signature in cursive script that reads "Tristan M. Shaffer". The signature is written in black ink and is positioned above a horizontal line.

Tristan M. Shaffer
Axelrod and Associates
4701 Oleander Drive
Myrtle Beach, SC 29577
SC Bar # 77565

Attorney for Petitioner

July 8, 2014

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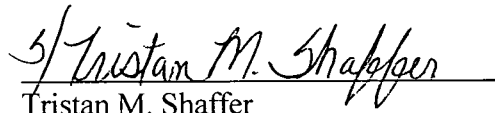
RESPONDENT.

APPELLATE CASE NO. 2013-002465

**CERTIFICATE OF SERVICE
PETITION AND AMENDED PETITION FOR
REINSTATEMENT OF APPEAL**

I, Tristan Shaffer, hereby certify that on the date listed below, a copy of the Petition to file the Writ of Certiorari out of time and Petition for extension of time to file the Petition for Writ of Certiorari and Appendix was served via U.S. mail upon Counsel for the State at the address below.

Respectfully submitted,


Tristan M. Shaffer
Attorney for Petitioner

July 8, 2014

Other Counsel of Record:

Suzanne White
S.C. Attorney General's Office
P.O. Box 11549
Columbia, SC 29211