

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 September 29, 2014. In support of this motion, counsel would show the Court the following:

1. This Petition was due to be on August 29, 2014.
2. Counsel has been unable to complete this Petition due to his many other obligations. Counsel has been working in excess of 14 hours a day during the last two weeks on this and other time sensitive matters. Additionally, counsel has worked the last two weekends and has been unable to complete this petition or all of the other matters due.
3. Over the last two weeks counsel has had an extremely busy schedule. In addition to have to prepare this case, Counsel has argued **seven** PCR hearings. On August 30, 2014, Counsel has completed a brief to the Fourth Circuit Court of Appeal Counsel in the case of United States v. Anrique Zachery. Counsel has also

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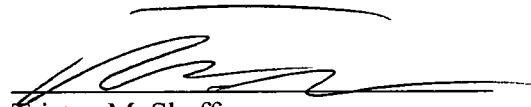
S.C. Supreme Court

worked on preparing another Petition for Writ of Certiorari to this Court in the case of Joseph White v. State. Additionally, Counsel has been assisting appointed counsel in the capital PCR case of Stephen Stanko v. State.

4. Counsel intended on filing an extension request on or before Friday, August 29, 2014, however, Counsel overlooked the notation on his calendar.
5. Counsel is requesting a 30-day extension to have the Petition for Writ of Certiorari and Appendix completed.
6. Counsel regrets this unintentional delay. This request is made in good faith, and not for purposes of delay.

WHEREFORE, the undersigned counsel would respectfully requests to have his time limit for filing these documents extended until September 23, 2014. Counsel requests that the time limits be held in abeyance pending a ruling on this motion.

Respectfully submitted,



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

Attorney for Petitioner

September 2, 2014

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Appeal from Chester County

The Honorable J. Ernest Kinard, Circuit Court Judge

WILLIAM DAVID DOVE,

PETITIONER,

V.

THE STATE,

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APPELLATE CASE NO. 2013-002465

CERTIFICATE OF SERVICE

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

September 2, 2014

Other Counsel of Record:

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

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September 2, 2014

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The Hon. Daniel E. Shearouse
Clerk, Supreme Court of South Carolina
Post Office Box 11330
Columbia, SC 29211

S.C. Supreme Court

RE: William David Dove v. State of South Carolina Case No.: 2013-002465

Clerk or Court:

Please file the attached Petition to File Petition for the Writ of Certiorari Out of Time and Petition for Extension of Time to File the Writ of Cetiolari and Appendix.

Thank you for your help with this matter.

With kind regards,



Tristan M. Shaffer

Cc: Croom Hunter
S.C. Office of the Attorney General
Post Office Box 11549
Columbia, SC 29211

AXELROD

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