

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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OCT 01 2014

Appeal from Chester County
J. Ernest Kinard, Circuit Court Judge

S.C. SUPREME COURT

DAVID DOVE,

PETITIONER,

V.

THE STATE OF SOUTH CAROLINA,

RESPONDENT.

Appellate Case No. 2013-002465

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

The undersigned counsel would respectfully request a **final 30-day** extension of time to file the Petition for Writ of Certiorari and Appendix in this case. In support of this petition, Counsel would respectfully show the Court the following exigent circumstances:

1. The Petition for Writ of Certiorari and Appendix were due to be filed today September 29, 2014
2. Counsel diligently worked on this matter but was been unable to complete it on time due to his many other obligations.
3. Counsel has since completed the Petition for Writ of Certiorari and Appendix and is ready to file these documents.
4. Over the last several weeks, counsel has had an extremely busy schedule. In addition to this petition, 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 worked on preparing two other Petitions for Writ of Certiorari to for this court. Additionally, Counsel has been assisting appointed counsel in the capital PCR case of *Stanko v. State*.

5. Moreover, Counsel had to spend most of last week preparing for the murder trial of *State v. Deshawn McClary* which was scheduled for this week. Counsel has since learned that this case would not be called.

6. Counsel has also been preparing to present six PCR cases that are scheduled for next week.

7. Unfortunately, Counsel has not been able to devote adequate time to prepare this Writ of Certiorari.

8. Counsel has spoken to Counsel for the State, Croom Hunter, who does not oppose this request and has authorized Counsel to indicate such in this Petition.

9. 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 respectfully request a final 30-day extension of time to file the Petition for Writ of Certiorari and Appendix in this case.

[Signature Page to Follow]

Respectfully submitted,



Tristan M. Shaffer

AXELROD & ASSOCIATES

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September 29, 2014

AXELROD & ASSOCIATES, P.A.

Attorneys and Counselors at Law

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September 29, 2014

Clerk of Court
Supreme Court of South Carolina
Post Office Box 11330
Columbia, SC 29211

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

Clerk or Court:

Please file the Enclosed Petition for Extension of Time to File the Petition for Writ of Certiorari and Appendix.

I have spoken to the Attorney representing the State, Croom Hunter, who has indicated that Respondent does not oppose this request.

Thank you for your help with this matter.

With kind regards,



Tristan M. Shaffer

cc: Croom Hunter, Esquire

604 Sixteenth Ave. North ♦ Myrtle Beach, SC 29577

AXELROD
& ASSOCIATES
ATTORNEYS AT LAW

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