

# BLUME FRANKLIN-BEST & YOUNG, LLC

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## ATTORNEYS AT LAW

JOHN H. BLUME  
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900 Elmwood Avenue, Suite 200  
COLUMBIA, SOUTH CAROLINA 29201  
PHONE: (803) 765-1044  
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January 22, 2019

RECEIVED

JAN 24 2019

The Honorable Daniel E. Shearouse  
Clerk  
South Carolina Supreme Court  
P.O. Box 11330  
Columbia, S.C. 29211

S.C. SUPREME COURT

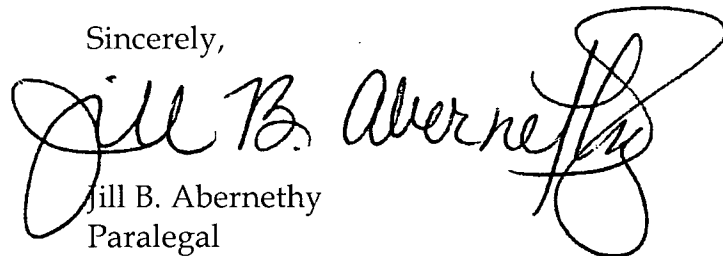
RE: *William O. Dickerson v. State of South Carolina*, Appellate Case No. 2018-001499

Dear Mr. Shearouse,

Please find enclosed for filing, with certificate of service, the original and seven copies of Petitioner's Motion for Extension of Time in the above captioned case. If you can please clock-in the extra copy and return it to me in the enclosed self-addressed stamped envelope.

If you should have any questions, please do not hesitate to contact me.

Sincerely,

  
Jill B. Abernethy  
Paralegal

cc: Melody Brown, Esq.

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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JAN 24 2019

S.C. SUPREME COURT

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable G. Thomas Cooper, Presiding Judge

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Appellate Case No. 2018-001499

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William O. Dickerson, .....Petitioner,

v.

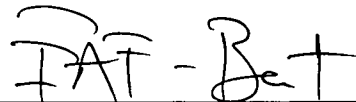
The State of South Carolina.....Respondent.

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MOTION FOR EXTENSION

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Undersigned counsel respectfully requests a third extension in this capital appeal. Counsel had a federal habeas petition that was filed January 10, 2019 (the date of the expiration of the statute of limitations). *Bowman v. Stirling*, 9:18-cv-00287-TLW-BM. Additionally, counsel had a petition for rehearing due in the Fourth Circuit that was filed on Friday, January 18, 2019. *United States v. Michael Slager*, Appellate Case No. 18-4036. And counsel also had a traverse due a federal habeas case. *Sammy Cowan v. Stirling*, C/A 6:18-cv-02827-TLW-KFM. That pleading was filed on January 16, 2019. Counsel does not foresee anything that would impede her ability to have this petition and appendix filed by February 22, 2019, and respectfully asks for an extension to that date. Counsel has conferred with Melody Brown of the Attorney General's Office, and she is not opposed to this request.



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Elizabeth Franklin-Best  
Blume Franklin-Best & Young, LLC  
900 Elmwood Avenue, Suite 200  
Columbia, South Carolina 29201  
(803) 765-1044

*Attorney for Petitioner*

January 22, 2019

*Other Counsel:*

Melody Brown

South Carolina Attorney General's Office

1000 Assembly Street

Columbia, South Carolina 29201

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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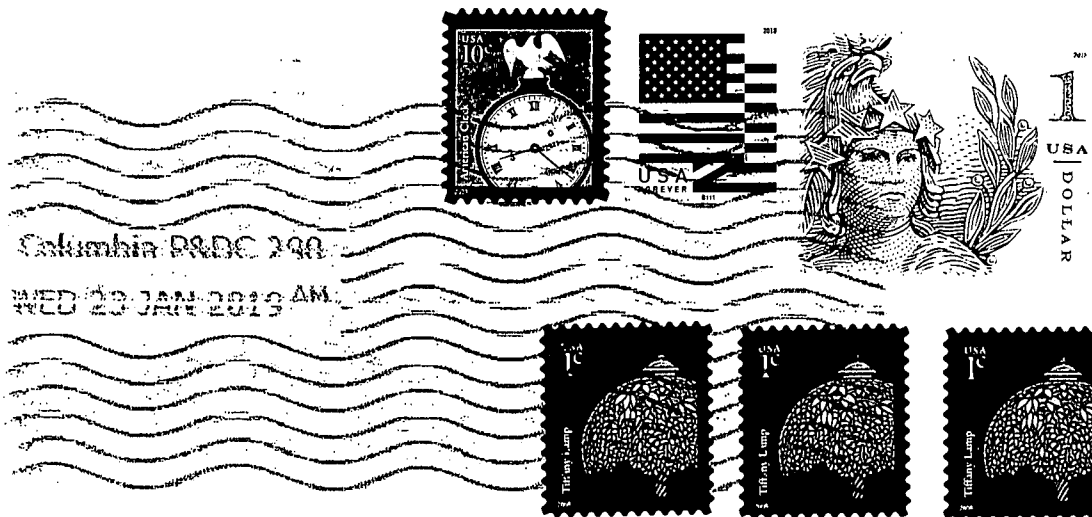
**CERTIFICATE OF SERVICE**

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I hereby certify that I have served opposing counsel, Melody Brown of the South Carolina Attorney General's Office by mailing this motion, 1<sup>st</sup> class postage pre-paid, on this date, through the US Mail.

  
Elizabeth Franklin-Best  
Blume Franklin-Best & Young, LLC  
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(803) 765-1044

*Attorney for Petitioner*



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