

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable G. Thomas Cooper, Presiding Judge

Appellate Case No. 2018-001499

RECEIVED
FEB 20 2019
S.C. SUPREME COURT

William O. Dickerson,Petitioner,

v.

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

MOTION FOR EXTENSION

Counsel respectfully requests one final extension to file the petition for writ of certiorari and the appendix in this case. The briefing is nearly complete, but counsel is still assembling the voluminous appendix. Counsel has been coordinating with Kami Ruple of the Charleston County Clerk of Court's Office to have the exhibits scanned and provided to counsel for inclusion in the appendix. Counsel expects to have the documents in her possession by this next week. Counsel has also been in communication with Hugh Ryan of the Office of Indigent Defense regarding his preferred manner of handling the expense of having the Appendix bound and copied. Counsel also additionally has three federal sentencing hearing scheduled in the next month: *USA v. Tony Shuler*, 3:18-cr-00448-MGL is scheduled for February 21, 2019, and *USA v. Virgil Earp*, 3:17-cr-00135-TLW, and *USA v. Jonathan Brown*, 3:17-cr-000136-TLW are scheduled for March 12, 2019. Earp and Brown are expected to be contested hearings. Counsel also has a Petitioner's brief

and Appendix due in *Oscar Fortune v. State of South Carolina* due on March 1, 2019. Counsel also has an oral argument before this Court on March 5, 2019 in *State v. Robert Jarad Prather* and is attending the American Bar Association's 33rd Annual National Institute on White Collar Crime in New Orleans from March 6-8, 2019. Melody Brown of the Attorney General's Office consents to this extension.



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February 19, 2019

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CERTIFICATE OF SERVICE

I hereby certify that I have served opposing counsel, Melody Brown of the South Carolina Attorney General's Office by mailing this motion, 1st class postage pre-paid, on this 19th day of February, through the US Mail.

Elizabeth Franklin-Best

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