

STATE OF SOUTH CAROLINA  
In the Supreme Court

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Appeal from Charleston County  
The Honorable G. Thomas Cooper, Jr., PCR Judge

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\*CAPTTAL CASE\*

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RECEIVED

JUL 24 2019

S.C. SUPREME COURT

WILLIAM O. DICKERSON,

Petitioner,

v.

STATE OF SOUTH CAROLINA,

Respondent.

Appellate Case No. 2019-001499

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**THIRD MOTION FOR EXTENSTION OF TIME TO FILE  
RETURN TO PETITION FOR WRIT OF CERTIOARI**

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Undersigned counsel for Respondent, State of South Carolina, would respectfully request an additional thirty (30) day extension of time in which to file the Return to Petition for Writ of Certiorari in the above-referenced case. Respondent requests the time for filing be extended up to and including August 23, 2019. Counsel for Appellant has graciously consented to the request via email. In support of this motion, counsel would respectfully show the Court the following:

In past thirty days the undersigned has been involved in various state and federal matters including several time-sensitive matters that required immediate work, and also had a concentration of work in several capital litigation matters at the same time, including: prepared and filed a petition for rehearing in a state murder direct appeal (*State v. Billy Lemurces Taylor*); prepared and served a proposed order of dismissal in a non-capital PCR action (*Stanley Golson v. State*); prepared and filed a response in opposition to motions for discovery in a federal habeas

action (*Herriott v. McCabe*); prepared and filed a reply in the Supreme Court of the United States in a capital case in federal habeas review (*Charles Williams v. Stirling*); prepared and filed a petition for rehearing and rehearing en banc, and a motion to stay the mandate, in the Fourth Circuit Court of Appeals (*Broderick Seay v. Cannon*); aided in completion of the return filed in another capital case presently in the District Court of South Carolina (*Quincy Allen v. Stirling*); consulted and provided materials for a joint appendix in another capital case in federal habeas pending in the Fourth Circuit Court of Appeals (*Sammie Stokes v. Stirling*); and, reviewed discovery and also filed a motion for continuance of evidentiary hearing in a capital case on post-conviction relief review that was previously scheduled to begin July 29, 2019 (*Winkler v. State*). Counsel has also been working on a brief in response to be filed in the Fourth Circuit Court of Appeals in another capital federal habeas action (*Freddie Owens v. Stirling*); and the return in this case (*William Dickerson v. State*), but has not yet completed either. In addition, counsel has supervisory duties for the unit's seven (7) other attorneys, which includes consultation and editing of various other pleadings and briefs filed within the last month.

For these reasons, undersigned counsel has not been able to complete a proper return for filing with the Court. Counsel has, however, made substantial progress on the return.

This request is made in good faith, and not for the purpose of delay. Counsel will work diligently to complete the return in the time requested.

WHEREFORE, based on the foregoing, undersigned counsel for Respondent respectfully requests a thirty (30) day extension of time to serve and file the Return in this matter.

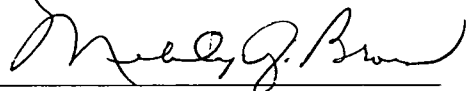
Respectfully Submitted,

ALAN WILSON  
Attorney General

DONALD J. ZELENKA  
Deputy Attorney General

MELODY J. BROWN  
Senior Assistant Deputy Attorney General  
SC Bar No. 14244

Post Office Box 11549  
Columbia, South Carolina 29211  
(803) 734-6305

By:   
MELODY J. BROWN  
ATTORNEYS FOR RESPONDENT

July 24, 2019.

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**PROOF OF SERVICE**

I, Angela Bennett certify that I have served two (2) copies of the motion for extension of time to file the Return to Petition for Writ of Certiorari via U.S. mail to Appellant's attorney of record, Elizabeth Franklin-Best, Esquire, 900 Elmwood Avenue, Suite 200, Columbia, South Carolina 29201.

I further certify that all parties required by Rule to be served have been served.

This 24<sup>th</sup> day of July, 2019.



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ANGELA BENNETT  
Administrative Coordinator  
Office of the Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29211  
(803) 734-6305