

STATE OF SOUTH CAROLINA
In the Supreme Court

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

RECEIVED

AUG 23 2019

S.C. SUPREME COURT

WILLIAM O. DICKERSON,

Petitioner,

v.

STATE OF SOUTH CAROLINA,

Respondent.

Appellate Case No. 2018-001499

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

Undersigned counsel would respectfully request a thirty (30) day extension in which to file the Return to Petition for Writ of Certiorari in the above-referenced case. Counsel moves for the time for return be extended by thirty (30) days up to and including Monday, September 23, 2019. Opposing counsel has graciously consented to the request via email. This return had been extended three prior times. 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: prepared and filed a motion for summary judgment and return and memorandum of law in support of motion for summary judgment in a non-capital federal habeas action on July 26, 2019 (*John McCombs*); prepared and filed a two responses in opposition to separate motions on June 29, 2016, and filed a motion for summary judgment with return and memorandum in

support of motion for summary judgment on August 2, 2019, in another non-capital federal habeas action (*Kristie Bishop*); prepared and filed a joint status report in a capital federal habeas action on July 29, 2019, and in a related state successive PCR action for the same defendant, prepared for and participated in a telephone status/scheduling conference on August 15, 2019 and drafted a proposed circulated and submitted that same day (*Bayan Aleksey*); prepared and filed with this Court on August 6, 2019, a brief of respondent in a murder direct appeal (*Aaron Young, Jr.*); prepared and filed on August 6, 2019 in the Supreme Court of the United States an application to the Chief Justice to stay the mandate of the Fourth Circuit Court of Appeals in non-capital federal habeas (*Broderick Seay*); and, on August 16, 2019, completed and filed a response brief in a capital federal habeas action appeal in the Fourth Circuit Court of Appeals (*Freddie Owens*). Counsel also attended a pre-arranged out-of-state professional conference August 7-10, 2019. The primary reason for this additional extension, though, is to have time to complete an expedited appendix and petition for filing in the Supreme Court of the United States on or before September 3, 2019 (*Broderick Seay*). That expedited filing necessitates time be devoted to that matter that was not anticipated at the time of the last request.

This request is made in good faith, and not for the purpose of delay.

WHEREFORE, based on the foregoing, and with the consent of opposing counsel, undersigned counsel hereby respectfully requests an additional thirty (30) day extension of time to serve and file the Return in this matter.

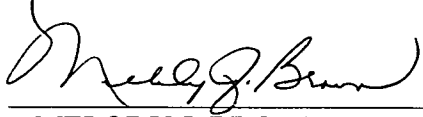
Respectfully Submitted,

ALAN WILSON
Attorney General

DONALD J. ZELENKA
Deputy Attorney General

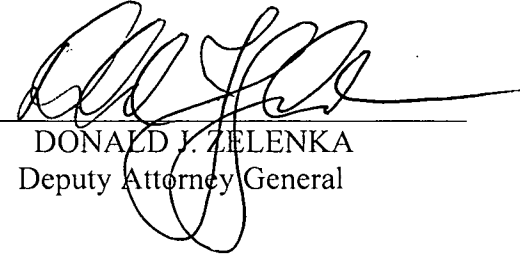
MELODY J. BROWN
Senior Assistant Deputy Attorney General

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

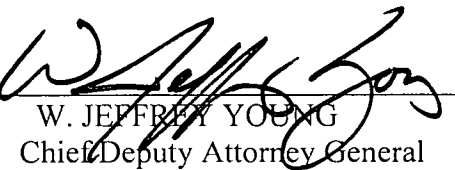
By: 
MELODY J. BROWN
ATTORNEYS FOR RESPONDENT

August 22, 2019.

I support the finding of good cause.

By: 
DONALD J. ZELENKA
Deputy Attorney General

I support the finding of good cause.

By: 
W. JEFFREY YOUNG
Chief Deputy Attorney General

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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, 2725 Devine St., Columbia, SC 29205.

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

This 23rd day of August, 2019.



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