

STATE OF SOUTH CAROLINA  
In the Supreme Court

---

**RECEIVED**

SEP 23 2019

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

---

S.C. SUPREME COURT

WILLIAM O. DICKERSON,

Petitioner,

v.

STATE OF SOUTH CAROLINA,

Respondent.

Appellate Case No. 2018-001499

---

**MOTION TO EXCEED PAGE LIMITS FOR THE  
RETURN TO PETITION FOR WRIT OF CERTIORARI**

---

Undersigned counsel for Respondent respectfully moves for an order allowing her to file a return to the petition for writ of certiorari in excess of the twenty-five (25) page limit imposed by Rule 243(g), SCACR. In support of this motion, counsel would respectfully show the Court:

1. The return to the petition for writ of certiorari in this capital post-conviction relief action is due to be served and filed in this Court, today, September 23, 2019.
2. On April 23, 2019, this Court granted Petitioner's petition to exceed the page limit for petitions. The filed petition is ninety-three (93) pages of text. Petitioner raises eight (8) issues.
3. Counsel for Respondent has completed the return to the petition. To adequately address the claims, Respondent has prepared a forty-two page return. Respondent has diligently

attempted to trim the return but finds it necessary to request the Court's permission to exceed the standard page limit.

4. Undersigned counsel for Respondent has discussed this motion with opposing counsel, Elizabeth Franklin-Best, Esq. Ms. Franklin-Best has informed undersigned counsel that she has no objection to this motion.

5. Respondent will serve and conditionally submit the return today, pending resolution of this motion.

WHEREFORE, undersigned counsel would respectfully request an order from this Court granting Respondent permission to exceed the twenty-five page limit of Rule 227(e)(3), SCACR, and accept the conditionally filed return.

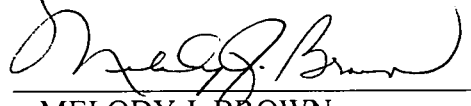
Respectfully Submitted,

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  
SC Bar No. 14244  
ATTORNEYS FOR RESPONDENT

September 23, 2019.

STATE OF SOUTH CAROLINA  
In the Supreme Court

---

RECEIVED

SEP 23 2019

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

---

S.C. SUPREME COURT

WILLIAM O. DICKERSON,

Petitioner,

v.

STATE OF SOUTH CAROLINA,

Respondent.

Appellate Case No. 2018-001499

---

**PROOF OF SERVICE**

---

I, Angela Bennett certify that I have served two (2) copies of the motion for extension of time to file the Motion to Exceed Page Limits for 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 23<sup>rd</sup> day of September, 2019.



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