

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

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Appeal from Cherokee County

R. Keith Kelly, Circuit Court Judge

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THE STATE,

RESPONDENT,

V.

FRANKLIN PIERRE DOVER,

APPELLANT

Appellate Case No. 2019-001244

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PETITION FOR EXTENSION TO FILE  
INITIAL BRIEF OF APPELLANT  
AND DESIGNATION OF MATTER

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**RECEIVED**

**Jun 22 2020**

**SC Court of Appeals**

The undersigned counsel respectfully requests a thirty-day extension from June 25, 2020 until July 27, 2020 in which to file the initial brief of appellant and designation of matter in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The initial brief of appellant and designation of matter in this case are due to be served and filed Thursday, June 25, 2020.

2. Counsel filed the brief of appellant and designation of matter in the case of The State v. Brian David Walls with this Court on June 18, 2020. Counsel had a WebEx oral argument before this Court on June 3, 2020 in The State v. John Ernest Perry. Counsel filed the brief of appellant and designation of matter in the case of The State v. Gabriel Joyner with this Court on May 29, 2020. Counsel had a WebEx oral argument before this Court on May 27, 2020 in The

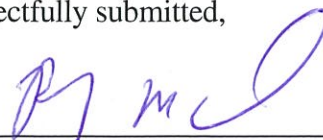
State v. James Caleb Williams. Counsel had a WebEx oral argument before this Court on May 5, 2020 in The State v. Howard James Woods, Jr. Counsel filed a petition for writ of certiorari to this Court and accompanying appendix in The State v. Edward Primo Bonilla, with the Supreme Court on May 4, 2020. Counsel filed the petition for rehearing in the case of The State v. Justin Jamal Warner with this Court on April 22, 2020. **Counsel has extensive administrative duties as the Chief Appellate Defender, including administrative and Appellate Project oversight, and training four less experienced appellate defenders and reviewing all their filings in advance.**

3. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

4. Opposing counsel, the Attorney General's Office, has graciously consented to this extension request by way of the extended thirty-day general consent granted by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through June 30, 2020. That extended, emailed general consent was dated May 20, 2020.

WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension from June 25, 2020 until July 27, 2020. Counsel respectfully requests that the time limits for filing the initial brief of appellant and designation of matter be held in abeyance pending a ruling on this motion.

Respectfully submitted,



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Robert M. Dudek  
Chief Appellate Defender

This 22<sup>nd</sup> day of June, 2020

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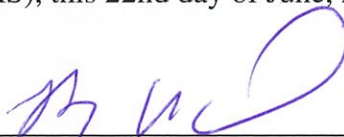
FRANKLIN PIERRE DOVER,

APPELLANT

APPELLATE CASE NO. 2019-001244

CERTIFICATE OF SERVICE

Pursuant to the Supreme Court’s Order “RE: Operation of the Appellate Courts During the Coronavirus Emergency,” dated March 20, 2020, the undersigned hereby certifies a true copy of the motion for an extension of time, in which to file the initial brief of appellant and designation of matter in the above-referenced case has been served upon Melody J. Brown, Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), this 22nd day of June, 2020.

  
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Robert M. Dudek  
Chief Appellate Defender

ATTORNEY FOR APPELLANT.