

ORIGINAL

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Pickens County  
D. Garrison Hill, Circuit Court Judge  
\_\_\_\_\_

RECEIVED

APR 25 2013

S.C. Supreme Court

JAMES MICHAEL DOVER,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2012-212588

\_\_\_\_\_  
MOTION FOR AN EXTENSION OF TIME  
IN WHICH TO FILE THE PETITION FOR WRIT OF  
CERTIORARI AND APPENDIX  
\_\_\_\_\_

Counsel for James Michael Dover respectfully requests an extension of thirty (30) days in which to file the petition for writ of certiorari and appendix in this case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. This is a second request for an extension. In support of this request, counsel shows:

1. The petition for writ of certiorari and appendix are due to be served and filed with the Court today.
2. Counsel for James Michael Dover respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions previously granted and the order in which counsel attempts to manage her caseload, counsel hopes that no further extension requests will be required.

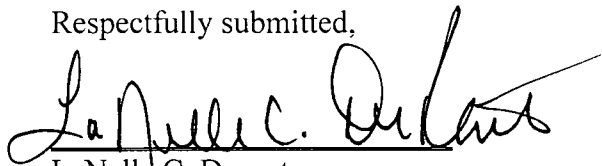
3. Counsel filed the Johnson Petition for Writ of Certiorari in the case of Giles Belcher v. State of South Carolina with this Court on April 24, 2013. Counsel filed the Johnson Petition for Writ of Certiorari in the case of Jeremy J. Jeter v. State of South Carolina with this Court on April 24, 2013. Counsel filed the Brief of Petitioner in the case of In the Matter of the Care and Treatment of Gilbert Gonzalez in this Court on April 23, 2012. Counsel filed the Brief of Petitioner and the Brief of Respondent in the case of In the Matter of Care and Treatment of Vince Neal Way in this Court on April 23, 2013. Counsel filed the petition for rehearing in the case of State v. Alonza Dennis in the Court of Appeals on April 18, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Justin Nelson v. State with this Court on April 15, 2013. Counsel had an oral argument in the case of State v. Ronald Gooden in the Court of Appeals on April 10, 2013. Counsel had an oral argument in the case of State v. John Mack with the Court of Appeals on April 9, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Christopher O'Neal Pringle v. State in this Court on April 3, 2013. Counsel had an oral argument in the case of State v. David Jakes with the Court of Appeals on April 3, 2013. Counsel had an oral argument in the case of State v. Anthony Martin in the Court of Appeals on April 3, 2013. Counsel had an oral argument in the case of State v. Clarence Logan, Jr. with this Court on April 2, 2013. Counsel had an oral argument in the case of State v. Eugene Patterson in the Court of Appeals on April 1, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Alfred Redwine v. State with this Court on March 27, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Bryan Phillips v. State in the United States Supreme Court on March 14, 2013. Counsel had an oral argument in the case of State v. Daniel Rogers in the Court of Appeals on March 7, 2013. Counsel had an oral argument in The Matter

of the Care and Treatment of Thomas Simmons in this Court on March 5, 2013. Counsel had an oral argument in the case of State v. Alonza Dennis in the Court of Appeals on March 5, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Robert Young v. State with this Court on March 4, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of David Wilson v. State in this Court on March 1, 2013. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Lakendrick K. Leverette v. State with this Court on February 28, 2013. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Phillip Sims v. State with this Court on February 22, 2013.

4. Counsel makes this request in good faith and not for purpose of delay.
5. Counsel for the Attorney General's office has been informed of this request.

WHEREFORE, the undersigned counsel would respectfully request a thirty day extension, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,



LaNelle C. Durant  
Appellate Defender

Attorney for Petitioner

April 25<sup>th</sup>, 2013

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IN THE SUPREME COURT

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Certiorari to Pickens County  
D. Garrison Hill, Circuit Court Judge

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JAMES MICHAEL DOVER,

PETITIONER,

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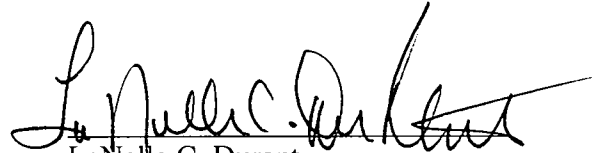
APPELLATE CASE NO. 2012-212588

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CERTIFICATE OF SERVICE

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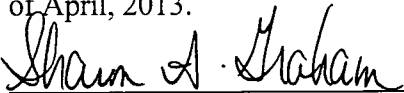
I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon Karen Ratigan, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 25<sup>th</sup> day of April, 2013.



LaNelle C. Durant  
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 25<sup>th</sup> day  
of April, 2013.

 (L.S.)

Notary Public for South Carolina

My Commission Expires: April 27, 2022.