

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

RECEIVED
OCT 20 2013 ORIGINAL

Certiorari to Dorchester County

James E. Lockemy, Circuit Court Judge

S.C. Supreme Court

MARION BOWMAN,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2012-213468

PETITION TO EXCEED TWENTY-FIVE
PAGE LIMIT FOR A PETITION FOR
A WRIT OF CERTIORARI

The undersigned counsel would respectfully request an order allowing him to file a petition for writ of certiorari in this case in excess of the twenty-five page limit imposed by Rule 243(e)(3), SCACR. In support of this motion, counsel would respectfully show the Court:

1. The petition for writ of certiorari and the appendix in this case are due on October 18, 2013. The appendix in this case is **ten thousand pages**, and at present has **nine** meritorious issues, with subparts, counsel plans to raise on appeal. Counsel is working on this case with co-counsel David Alexander, and Michael Anzelmo of the Nelson Mullins law firm.

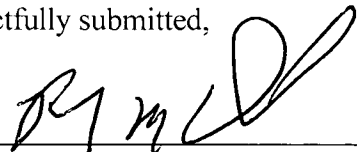
2. Counsel does not think that justice to the numerous meritorious issues in this death penalty case can be done in the twenty-five pages authorized by Rule 243(e)(3), SCACR.

3. Consequently, counsel respectfully moves that this Court allow him to file a petition for a writ of certiorari not in excess of one hundred twenty-five pages. Counsel will make every effort for brevity, and hopefully will be considerably short of that one hundred twenty-five page limit in the final analysis.

4. Opposing counsel, Donald Zelenka, of the Office of the Attorney General, graciously has indicated that he does not oppose this request as also evidenced by his signature below.

WHEREFORE, undersigned counsel would respectfully request an order from this Court granting him the right to exceed the twenty-five page limit of Rule 243(e)(3), SCACR. Counsel would also request that the order grant him the right to file a petition for a writ of certiorari in this death penalty case not in excess of one hundred twenty-five pages.

Respectfully submitted,

By: 
Robert M. Dudek
Chief Appellate Defender

David Alexander
Assistant Appellate Defender

Michael Anzelmo
Nelson Mullins Riley & Scarborough, LLP

Attorneys for Petitioner

I do not oppose this request:


Donald Zelenka

October 7, 2013

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Dorchester County

James E. Lockemy, Circuit Court Judge

MARION BOWMAN,

PETITIONER,

V.

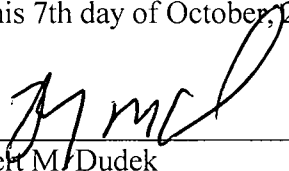
STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2012-213468

CERTIFICATE OF SERVICE

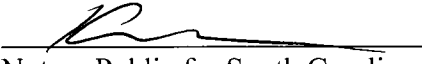
I certify that a true copy of the petition to file a petition for writ of certiorari in excess of the twenty-five page limit has been served on Donald Zelenka, Esquire, at Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 7th day of October, 2013.



Robert M. Dudek
Chief Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 7th day
of October, 2013.

 (L.S.)
Notary Public for South Carolina
My Commission Expires: August 21, 2023