

THE STATE OF SOUTH CAROLINA
In The Supreme Court

RECEIVED

NOV - 6 2013

S.C. Supreme Court

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Edward W. Miller, Circuit Court Judge

CA No. 09-CP-23-0741

FREDDIE EUGENE OWENS. *Petitioner,*

v.

STATE OF SOUTH CAROLINA *Respondent.*

**MOTION FOR LEAVE TO FILE A PETITION
FOR WRIT OF CERTIORARI IN EXCESS OF 25 PAGES**

The petition for writ of certiorari and appendix in this matter are currently due to be filed on November 8, 2013. Although undersigned counsel has diligently worked to edit and shorten the petition, counsel believes that adequate treatment of the issues in this case requires a petition that is longer than the twenty-five (25) pages allowed by Rule 243(e), SCACR. Counsel notes that this is a death penalty case, petitioner has been tried three (3) times as to punishment, and the appendix is over 3,600 pages. Counsel believes that a petition of not more than one-hundred (100) pages is necessary to adequately address the questions presented in this case. Thus,

counsel respectfully requests that the Court permit filing of a petition for writ of certiorari of up to one-hundred (100) pages in length.

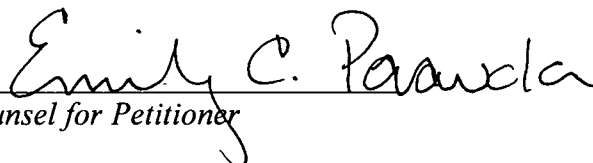
Respectfully submitted,

EMILY C. PAAVOLA

Death Penalty Resource & Defense Center
900 Elmwood Ave., Suite 101
Columbia, SC 29201
Emily@deathpenaltyresource.org
(803) 765-1044

KEIR M. WEYBLE

Cornell Law School
Myron Taylor Hall
Ithaca, NY 14853-4901
Kw346@cornell.edu
(607) 255-3805

By: 
Counsel for Petitioner

November 6, 2013

THE STATE OF SOUTH CAROLINA
In The Supreme Court

RECEIVED

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

NOV - 6 2013

Edward W. Miller, Circuit Court Judge

S.C. Supreme Court

CA No. 09-CP-23-0741

FREDDIE EUGENE OWENS. *Petitioner,*

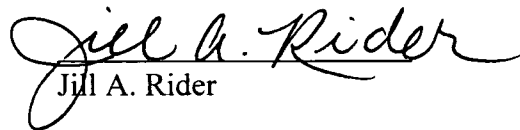
v.

STATE OF SOUTH CAROLINA *Respondent.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the Applicant's Motion For Leave to File a Petition For Writ of Certiorari In Excess of 25 Pages was served by first class United States mail, postage prepaid, this 6th day of November, 2013, upon the following:

J. Anthony Mabry
Assistant Attorney General
P.O. Box 11549
Columbia, SC 29211


Jill A. Rider