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Dec 08 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of General Sessions

Patrick C. Fant, III, Circuit Court Judge

Appellate Case No. 2025-000367

The State of South Carolina	v.	Respondent,
Zachary David Hughes		Appellant.

MOTION FOR PERMISSION TO EXCEED PAGE LIMIT

Zachary David Hughes moves, pursuant to S.C.App.R. 208(b)(5), for permission to exceed the page limit that S.C.App.R. 208(b)(5) imposes for his initial brief. In support of this Motion, he would show the following:

- On February 20, 2025, a jury convicted Hughes of multiple offenses, including murder, and the trial court sentenced him to life imprisonment after a prosecution that lasted more than three years and a trial proceeding that lasted ten days;
- On July 10, 2025, counsel for Hughes received the transcript. The transcript, with its accompanying attachments and/or exhibits, comprises 1,172 pages. The transcript commemorates jury selection, the parties' arguments and the trial court's rulings on multiple motions that were made both pretrial and during the trial, the testimony of approximately 35 witnesses, both before the jury and under proffer, objections the parties made during this testimony and the trial court's ruling on these objections, jury instructions conferences, the parties' closing arguments, and the trial court's

sentencing of Mr. Hughes. Additionally, the transcript commemorates discussion in connection with in excess of 200 exhibits;

- Upon information and belief, the length of Mr. Hughes’ trial, ten days, was far greater than most criminal trials;¹
- Mr. Hughes has identified approximately thirteen issues which he argues in his initial brief. The “Argument” section of his initial brief is approximately 55 pages, which yields, on average, just over four pages of argument per issue;²
- This Court has set Mr. Hughes’ deadline to file his initial brief for this Wednesday, December 10, 2025; and
- The State has graciously consented to this Motion.

For the foregoing reasons, Mr. Hughes requests permission to exceed the page length limit the South Carolina Appellate Court Rules set for initial briefs.

Respectfully submitted,

s/Andrew B. Moorman, Sr.
Andrew B. Moorman, Sr. (SC Bar # 69670)
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¹ See c.f., “Lengths Courts Go to Try a Case--- And Possible Remedies,” U.S. Dept. of Justice, Off. of Justice Prog., <https://www.ojp.gov/ncjrs/virtual-library/abstracts/lengths-courts-go-try-case-and-possible-remedies> (visited on December 8, 2025) (citing a 1988 article from the *State Court Journal* and stating that “trial length varies greatly in courts between and within States. The median length for civil trials ranged from 10 to 30 hours and the median length for criminal trials ranged from 6.5 to more than 23 hours.”).

² The current length of the entire initial brief is approximately 90 pages.

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PROOF OF SERVICE

I certify that on this, the 8th day of December, 2025, Appellant's Motion for Permission to Exceed Page Limit was served on the Thirteenth Circuit Solicitor's Office and the South Carolina Attorney General's Office by email and/or US Mail.

Respectfully submitted,

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