

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

APPEAL FROM DORCHESTER COUNTY  
Court of General Sessions  
Court of Common Pleas

Dianne S. Goodstein, Circuit Court Judge  
(Trial)  
Deandrea G. Benjamin, Circuit Court Judge  
(PCR)

Case No. 2011-CP-18-1497

**RECEIVED**

DEC 31 2013

**S.C. Supreme Court**

Tiffany Sanders, ..... Petitioner,

vs.

State of South Carolina ..... Respondent,

MOTION FOR LEAVE TO FILE AMENDED PETITION FOR CERTIORARI

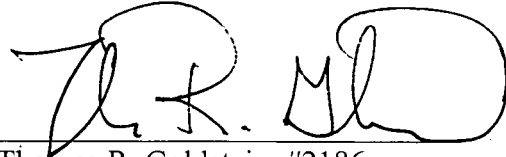
Petitioner previously filed and served her Petition for Certiorari on June 17, 2013. Even though the Petitioner discussed the reasons for the P.C.R. judge granting a direct appeal on page 6 under the heading, "Statement of the Case," the Petitioner did not break out the discussion under a separate heading as required by Rule 243(i), South Carolina Rules of Appellate Procedure. ("When the post-conviction relief judge has affirmatively found that the right to a direct appeal was not knowingly and intelligently waived, the petition shall contain a question raising this issue along with all other post-conviction relief issues petitioner seeks to have reviewed.") For this reason, the Petitioner seeks to substitute the attached Amended Petition for Writ of Certiorari, which adds a separate discussion of this issue under "Argument I" at page 9. The originally Argument I will now become Argument II, and Argument II will now become Argument III. The State will not have to re-file since it already addressed this issue in its Return to which the Petitioner has already filed a Reply. Thus the granting of this

Motion will not delay the scheduling of the case for review unless the State chooses to file an Amended Return.

Prior to filing this Motion, the undersigned consulted with opposing counsel who does not object to the relief requested in this Motion.

Respectfully submitted,

December 27, 2013

Handwritten signatures of Thomas R. Goldstein and Dale T. Cobb.

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