

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Edward W. Miller, Circuit Court Judge

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CA No. 09-CP-23-0741

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**RECEIVED**

SEP 02 2014

**S.C. SUPREME COURT**

FREDDIE EUGENE OWENS. .... *Petitioner,*

v.

STATE OF SOUTH CAROLINA ..... *Respondent.*

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**MOTION FOR LEAVE  
TO FILE A REPLY IN EXCESS OF 15 PAGES**

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Petitioner respectfully moves this Court for leave to file a reply in excess of 15 pages. Petitioner's Reply is due to be filed on September 3, 2014. This Court previously granted petitioner's request to expand the page limitations for the petition for writ of certiorari, which was 92 pages in length. Respondent's Return is 122 pages long. Although undersigned counsel has diligently worked to edit and shorten the reply, counsel believes that adequate treatment of the issues in this case requires a reply that is longer than the 15 pages allowed by Rule 243(g), 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 reply of not more than

25 pages is necessary to adequately address respondent's arguments in response to the petition for writ of certiorari. Thus, counsel respectfully requests that the Court permit filing of a reply of up to 25 pages in length.

Respectfully submitted,

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*Counsel for Petitioner*

August <sup>28</sup>, 2014

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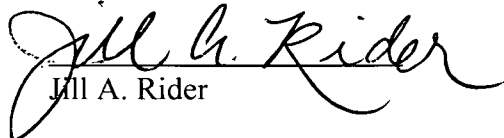
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**CERTIFICATE OF SERVICE**

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The undersigned hereby certifies that a copy of the Petitioner's Motion For Leave to File a Reply In Excess of 15 Pages was served by first class United States mail, postage prepaid, this 28<sup>th</sup> day of August, 2014, upon the following:

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

  
Jill A. Rider