

THE STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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APPEAL FROM CHEROKEE COUNTY  
Court of Common Pleas

Honorable J. Michael Baxley, Circuit Court Judge

RECEIVED

NOV 17 2014

CA No. 06-CP-11-223  
Appellate Case No. 2012-212107

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S.C. Supreme Court

JONATHAN KYLE BINNEY, SK 6009 .....*Petitioner/Respondent,*

v.

STATE OF SOUTH CAROLINA.....*Respondent/Petitioner.*

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**MOTION FOR LEAVE TO FILE BRIEF OF SOUTH CAROLINA RELIGIOUS  
LEADERS AND SCHOLARS AS *AMICUS CURIAE* IN SUPPORT OF  
PETITIONER/RESPONDENT**

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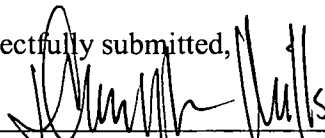
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**MOTION FOR LEAVE TO FILE BRIEF OF *AMICI CURIAE***

Pursuant to Rule 213, SCACR, the undersigned amici respectfully move for leave to file a brief of amici curiae. The undersigned amici comprise a group of influential religious leaders and scholars of various faiths in South Carolina. Together, they collectively represent nearly every major religious group in this State. They offer a valuable perspective on the role of mercy in society in general, in their respective faith doctrines and traditions, and in American history and jurisprudence. Their interest in this case stems from their unified view that mercy plays an indispensable role in capital sentencing in South Carolina, and that jurors must be permitted to act mercifully, if they so choose, in response to the evidence presented. A brief from the undersigned amici is desirable because it represents the views of a large portion of this State's population and their unique perspective on the broader social and historical context in which this Court will consider whether to reaffirm its prior recognition of mercy as an appropriate consideration in the capital sentencing process.

WHEREFORE, the undersigned group of South Carolina Religious Leaders and Scholars respectfully moves the Court to accept and file in this cause the Brief of Amici Curiae, attached to this motion.

Respectfully submitted,  
BY:   
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