

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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APPEAL FROM ABBEVILLE COUNTY  
Court of Common Pleas  
(Heard in Laurens County)

**S.C. SUPREME COURT**

The Honorable R. Lawton McIntosh, Circuit Court Judge

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Case No. 2009-CP-01-00105

**Appellate Case No. 2013-001076**

Marshall Ray Miller, #249557 ..... Petitioner,

v.

State of South Carolina ..... Respondent.

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**MOTION TO EXCEED PAGE LIMIT**

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The undersigned *pro se* Petitioner for Writ of Certiorari respectfully moves this Honorable Court, pursuant to Rule 240, SCACR, to Exceed the Page Limit for a Petition for Writ of Certiorari established in Rule 243(e)(3), SCACR, up to forty (40) pages.

Petitioner submits the following in support of this motion:

- 1) The voluminous materials (5 Volumes of Appendix and 2 Supplemental Appendix);
- 2) The nature and depth of the State Grand Jury's investigation and prosecution of numerous parties (Operation "Crankdown");

- 3) The federal constitutional issues surrounding the State's draconian application of S.C. Code Ann. §14-7-1700 et seq. that has denied Petitioner discovery<sup>1</sup> at every level of litigation (trial, direct appeal, and post-conviction relief); and
- 4) The jurisdictional issues challenging the legality of Petitioner's custody and evidence from out-of-state.

Petitioner submits that the factual circumstances and constitutional claims have required Petitioner to, in as concise form as possible, to present the number of Questions (8) in the Petition. Petitioner further submits that the federal constitutional claims require the factual detail currently set forth for an understanding of the complex claims and require the requested additional space.

Petitioner asserts that the extension of the page limit in this Petition would serve the interest of justice and not prejudice either party and that Petitioner is amicable to Respondent receiving the same page limit extension.

**WHEREFORE**, based on the foregoing, Petitioner respectfully moves this Honorable Court to grant leave to Exceed the Page Limit of the Petition for Writ of Certiorari up to forty (40) Pages.

Respectfully submitted,

November 13, 2014

Marshall Ray Miller  
Marshall Ray Miller  
#249557  
Lieber Correctional Inst. SB-56  
Post Office Box 205  
Ridgeville, South Carolina 29472

**PETITIONER, Pro se**

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<sup>1</sup> *Brady v. Maryland*, 373 U.S. 83 (1963)

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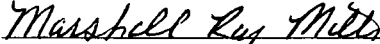
**PROOF OF SERVICE**

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The undersigned *pro se* petitioner, Marshall Ray Miller, hereby certifies that he has served a true and correct copy of the **MOTION TO EXCEED PAGE LIMIT** on counsel for Respondents and the Office of Appellate Defense by placing a copy in the U.S. Mail, first-class postage affixed thereto, this 14th day of November, 2014, addressed as follows:

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**PETITIONER, *Pro se***