

STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM EDGEFIELD COUNTY
Court of Common Pleas
Edgar W. Dickson, Circuit Court Judge

Appellate Case No. 2014-000591
Lower Court Case No. 2012-CP-19-0304

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FEB 12 2015

FREDY DELEON, #304977,

S.C. Supreme Court

RESPONDENT-PETITIONER,

v.

STATE OF SOUTH CAROLINA,

PETITIONER-RESPONDENT.

MOTION TO EXCEED PAGE LIMITATIONS

THIS MATTER comes before the Court by way of a PCR appeal. Pursuant to Rule 243(g), SCACR, a return to a petition for a writ of certiorari is not to exceed twenty-five pages. The Respondent-Petitioner (hereinafter "Respondent") respectfully moves this Honorable Court to permit him to exceed the page limitation set forth in Rule 243(g) in this matter. The Petitioner-Respondent's (hereinafter "Petitioner") certiorari petition is twenty-two pages in length and raised four different allegations of error by the PCR court. By the Respondent's count, there are no fewer than twelve distinct sub-allegations by which the Petitioner contends that the PCR court's rulings should either be overturned or remanded. Due to the complexity of some the issues involved and

the numerous allegations raised by the Petitioner, the Respondent could not adequately address the merits of the Petitioner's allegations within the page limitations of Rule 243(g). Accordingly, the Respondent respectfully requests that this Court relax these page limitations and permit him to file his return, which consists of thirty-two pages, not including the cover page or index.

Respectfully submitted,



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**ATTORNEY FOR RESPONDENT-
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This 12th day of February, 2015.