

STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM WILLIAMSBURG COUNTY
Court of Common Pleas

R. Ferrell Cothran, Jr., Circuit Court Judge

Appellate Case No. 2014-002270

RECEIVED

MAR 19 2015

S.C. Supreme Court

KEVIN C. BRADLEY, 339031,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT.

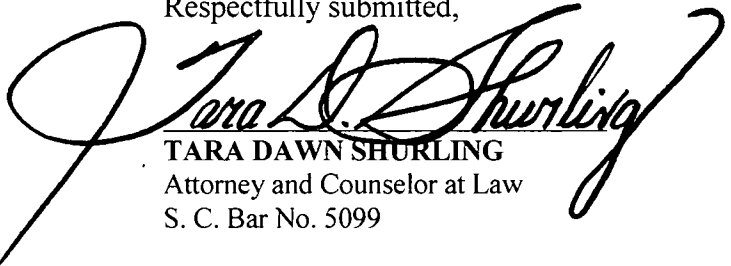
MOTION TO ENLARGE PAGE LIMITATION
FOR
PETITION FOR WRIT OF CERTIORARI

NOW COMES the Petitioner, acting by and through his undersigned counsel, asking leave of Court to exceed the page limitation set for Petitions for Writ of Certiorari by Rule 227 (e) (3), SCRAP. This Post-Conviction Relief Appeal arises from an unusually complex Application for Post-Conviction Relief. Petitioner has addressed a total of seven (7) questions covering thirteen allegations raised and argued in the Circuit Court.

The Petition for Writ of Certiorari was due in the matter on Wednesday, March 18, 2015. Counsel made a good faith effort to address all of the Petitioner's issues that were preserved for appellate review below, within the page limitation set by Rule 227 (e) (3). Unfortunately, due to the number and complexity of the issues presented below, Counsel for Petitioner was unable to present even a summary discussion of the issues within the twenty-five

(25) page limitation set by Rule 227 (e) (3), SCRPC. The Petition, mailed for filing on March 18, 2015, was a total of thirty-six (36) pages long. Opposing Counsel, Daniel Gourley, has indicated his consent to this request by his signature below. WHEREFORE, Petitioner prays for this Honorable Court to grant review of his Petition for Writ of Certiorari as filed March 18, 2015.

Respectfully submitted,



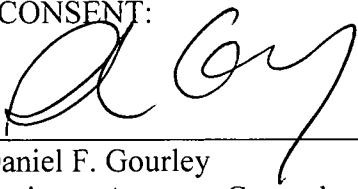
TARA DAWN SHURLING
Attorney and Counselor at Law
S. C. Bar No. 5099

3614 Landmark Drive, Suite A
Columbia, S. C. 29204
(803) 738-8622
(803) 738-1600 (FAX)

ATTORNEY FOR PETITIONER.

This the 19th day of March, 2015.

I CONSENT:



Daniel F. Gourley
Assistant Attorney General