

**STATE OF SOUTH CAROLINA
In The Supreme Court**

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**APPEAL FROM ANDERSON COUNTY
Court of Common Pleas**

S.C. Supreme Court

J. Cordell Maddox, Jr., Circuit Court Judge

Appellate Case No. 2014-002623

RICHARD KEVIN PATTERSON, 270085,

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 involving a murder conviction for which Petitioner received a life sentence and a charge of possession of a firearm during the commission of a violent crime for which Petitioner received a five (5) year concurrent sentence. Petitioner has addressed a total of seven (7) questions covering twenty-eight (28) allegations raised and argued in the Circuit Court. The

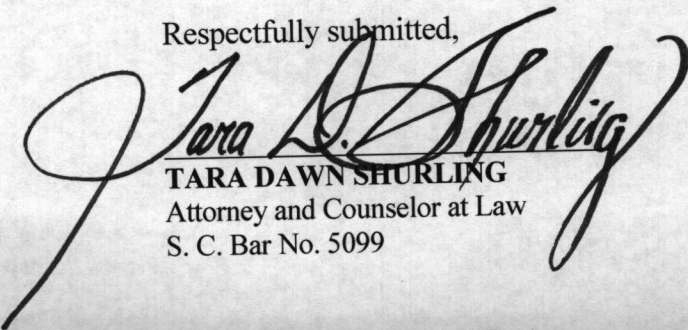
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Appendix to this PCR appeal is one thousand one hundred eighty one (1181) pages long. Two lengthy hearings were held on this PCR Application.

The Petition for Writ of Certiorari was due in the matter on April 13, 2015. Counsel made a good faith effort to address all of the Petitioner's issues 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), SCRCP. The Petition, mailed for filing on April 13, 2015, was a total of forty-eight (48) pages long. I have attempted to reach opposing counsel, David Spencer, Senior Assistant Attorney General, concerning this request, but have not been able to do so.

WHEREFORE, Petitioner prays for this Honorable Court to grant review of his Petition for Writ of Certiorari as filed April 13, 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 15th day of April, 2015.

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In The Supreme Court

APPEAL FROM ANDERSON COUNTY
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J. Cordell Maddox, Jr., Circuit Court Judge

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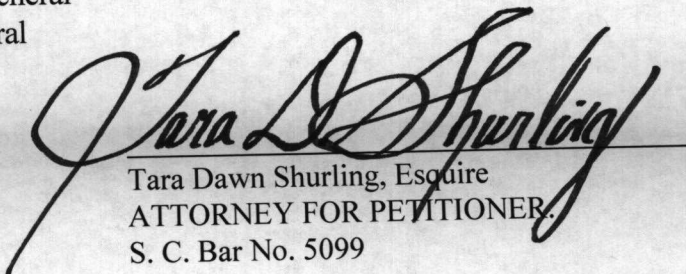
STATE OF SOUTH CAROLINA,

RESPONDENT.

CERTIFICATE OF SERVICE

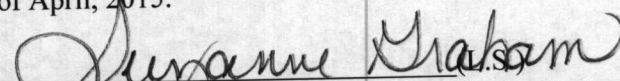
The undersigned hereby certifies that one (1) copy of the Motion to Exceed Page Limitation for Petition for Writ of Certiorari in the above-entitled case has been served upon opposing counsel this the 15th day of April, 2015, by depositing in the U.S. Mail, postage prepaid, and properly addressed to:

David Spencer
Senior Assistant Attorney General
Office of the Attorney General
P. O. Box 11549
Columbia, SC 29211


Tara Dawn Shurling, Esquire
ATTORNEY FOR PETITIONER.
S. C. Bar No. 5099

Law Office of Tara Dawn Shurling, PA
3614 Landmark Drive, Suite A
Columbia, SC 29204

SWORN TO BEFORE me this 15th day
of April, 2015.


Notary Public for South Carolina
My Commission Expires: 2/28/24

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TARA DAWN SHURLING, PA

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April 15, 2015

The Honorable Daniel E. Shearouse
Clerk, Supreme Court of South Carolina
P.O. Box 11330
Columbia, SC 29211

RE: Richard Kevin Patterson, 270085 v. State of South Carolina; 2014-002623.

Dear Mr. Shearouse:

Enclosed for filing please find the original and two (2) copies of the Motion to Enlarge Page Limitations for Petition for Writ of Certiorari and the Certificate of Service in the above-captioned case. I would appreciate you returning the two (2) clocked copies of the Motion to me in the envelope provided. I realize I have filed a few of these in recent months. I can assure the Court this isn't an emerging pattern. I have just had a few extremely complex cases involving a lot of issues all came up within a short period of time. Thank you for your assistance in this matter. I remain,

Sincerely yours,

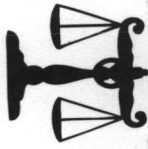
A large, stylized handwritten signature in black ink that reads "Tara Dawn Shurling".

Tara Dawn Shurling
Attorney and Counselor at Law

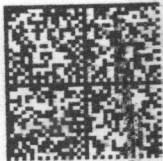
TDS/sm

Enclosures

cc: David Spencer, Senior Assistant Attorney General (w/enclosures)
Richard Kevin Patterson, 270085 (w/enclosures)
Billy and Barbara Patterson (w/enclosures)



Law Office of
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