

STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM WILLIAMSBURG COUNTY
Court of Common Pleas

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JUL - 9 2015

R. Ferrell Cothran, Jr. , Circuit Court Judge

S.C. Supreme Court

Appellate Case No. 2015-000136

KEVIN C. BRADLEY, 339031,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

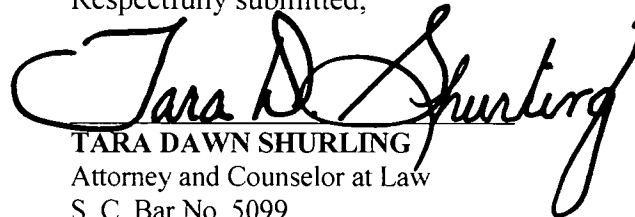
RESPONDENT.

MOTION TO ENLARGE PAGE LIMITATION
FOR
PETITION FOR WRIT OF CERTIORARI

Now comes the Petitioner, acting by and through his undersigned counsel, in the above captioned Post-Conviction Relief Appeal requesting that this Honorable Court grant her leave to exceed the page limit for a Petition for Writ of Certiorari set forth in Rule 243(e)(3), SCACR. The Petitioner respectfully submits that the complexity of this Post-Conviction Relief case, and the number of allegations raised in the lower court, require more than twenty-five (25) pages to properly present this case for appellate review. The Order of Dismissal issued by the lower court in this matter is thirty-two (32) pages long. On appeal, the Petitioner seeks review of the lower court's denial of relief on seventeen (17) grounds which PCR Counsel has grouped into five (5) arguments for purposes of appellate review. Counsel for the Petitioner respectfully submits that she can not effectively summarize all the Petitioner's issues in the twenty-five pages allowed under Rule 243 (e)(3), SCACR. For this

reason, the Petitioner asks that her thirty-seven (37) page Petition for Writ of Certiorari be accepted for filing. Opposing Counsel has been consulted concerning this matter and consents to this request.

Respectfully submitted,



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

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(803) 738-8622
(803) 738-1600 (FAX)

ATTORNEY FOR PETITIONER.

This the 9th day of July, 2015.

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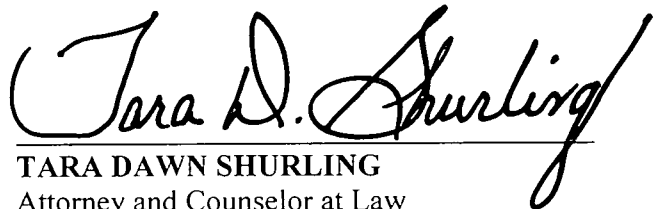
STATE OF SOUTH CAROLINA,

RESPONDENT.

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a 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 9th day of July, 2015, by depositing in the U.S. Mail, postage prepaid, one (1) copy properly addressed to:

Daniel Gourley
Assistant Attorney General
Office of the Attorney General
P. O. Box 11549
Columbia, SC 29211



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

ATTORNEY FOR PETITIONER.

SWORN TO BEFORE me this 9th day
of July, 2015.



(L.S.)
Notary Public for South Carolina

My Commission Expires: 2/28/24