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JUL 31 2015

S.C. Supreme Court

ALAN WILSON
ATTORNEY GENERAL

July 31, 2015

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

RE: Richard Kevin Patterson v. State of South Carolina
Appellate Case No.: 2014-002623

Dear Ms. Shearouse:

Enclosed for filing are the original and six (6) copies of the **Motion to Enlarge Page Limitation for Return to Petition for Writ of Certiorari** in the above-referenced case. By copy of this letter we are serving opposing counsel today.

Sincerely,

David A. Spencer
Senior Assistant Attorney General
SC Bar No. 68331

DAS/ah
Enclosures

cc: Tara D. Shurling, Esquire

STATE OF SOUTH CAROLINA
In The Supreme Court

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APPEAL FROM ANDERSON COUNTY
Court of Common Pleas

S.C. Supreme Court

The Honorable J. Cordell Maddox, Jr., Circuit Court Judge

Appellate Case No. 2014-002623

Richard Kevin Patterson Petitioner,

v.

State of South Carolina, Respondent.

**MOTION TO ENLARGE PAGE LIMITATION
FOR
RETURN TO PETITION FOR WRIT OF CERTIORARI**

NOW COMES the Respondent asking leave of Court to exceed the page limitation set for Returns to Petition for Writ of Certiorari by Rule 243(g), SCRAP. The Appendix to the PCR appeal is one thousand one hundred eighty one (1181) pages long. Two lengthy hearings were held on this PCR application.

The Return to Petition for Writ of Certiorari is due today, July 31, 2015. Because the Petition for Writ of Certiorari is so exhaustive, containing forty-eight (48) pages, counsel cannot address all issues presented in the petition within the page limitation set by Rule 243(g). The return will be approximately forty-five (45) pages long.

WHEREFORE, counsel for Respondent respectfully requests this Court to grant review of the Return to Petition for Writ of Certiorari as filed.

Respectfully submitted,

ALAN WILSON
Attorney General

DAVID A. SPENCER
Senior Assistant Attorney General
S.C. Bar # 68571

Post Office Box 11549
Columbia, S.C. 29211
(803) 734-3737

By  _____

ATTORNEYS FOR RESPONDENT

July 31, 2015

STATE OF SOUTH CAROLINA
In The Supreme Court

RECEIVED

APPEAL FROM ANDERSON COUNTY
Court of Common Pleas

JUL 31 2015

The Honorable J. Cordell Maddox, Jr., Circuit Court Judge
S.C. Supreme Court

Appellate Case No. 2014-002623

Eddie Dean Dogan, Jr., Petitioner,

v.

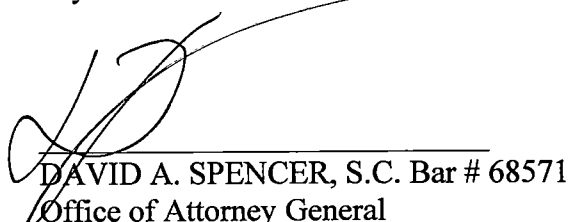
State of South Carolina, Respondent.

CERTIFICATE OF SERVICE

I, David A. Spencer, certify that I have today served the within Motion to Supplement Appendix upon Petitioner by depositing a copy of the same in the interagency mail, addressed to:

Ms. Tara Dawn Shurling, Esquire
Law Ofc. Of Tara Dawn Shurling, PA
3614 Landmark Drive Suite A
Columbia, SC 29204

I further certify that all parties required by Rule to be served have been served. This 31st day of July, 2015.



DAVID A. SPENCER, S.C. Bar # 68571
Office of Attorney General
Post Office Box 11549
Columbia, SC 29211
(803) 734-3737
ATTORNEY FOR RESPONDENT