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S.C. Supreme Court

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Georgetown County
Steven H. John, Circuit Court Judge

SHANNON MCGEE,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

MOTION TO EXCEED TWENTY-FIVE
PAGE LIMIT FOR A PETITION FOR
A WRIT OF CERTIORARI

The undersigned counsel respectfully requests an order allowing her to file the re-petition for writ of certiorari in this case in excess of the twenty-five (25) page limit imposed by Rule 243(e)(3), SCACR and accepting the thirty-one (31) page Re-Petition for Writ of Certiorari filed with this Court today.

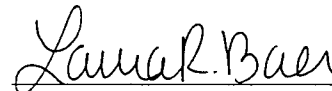
In support of the motion, counsel represents the following:

1. On September 29, 2015, this Court denied the motion to be relieved as counsel and ordered counsel to file a re-petition for writ of certiorari addressing eight issues, which

include prosecutorial misconduct, ineffective assistance of appellate counsel, and five issues related to ineffective assistance of trial counsel.¹

2. Counsel has prepared the Re-Petition for Writ of Certiorari and has diligently attempted to edit the Re-Petition in order to comply with the page limitation but finds it necessary to request this Court's permission to exceed the twenty-five page limit in order to properly address all of the issues to be raised.

WHEREFORE, undersigned counsel respectfully requests that this Court allow her to exceed the twenty-five (25) page limit of Rule 243(e)(3), SCACR and accept the Re-Petition for Writ of Certiorari filed along with this motion, which is thirty-one (31) pages.



Laura R. Baer
Appellate Defender

ATTORNEY FOR PETITIONER

December 10, 2015.

¹ Counsel was not the original appellate defender assigned to represent Petitioner and did not prepare the original Johnson petition.