

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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Certiorari to Barnwell County

Doyet A. Early, III, Circuit Court Judge

S.C. Supreme Court

TUNZY A. SANDERS,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-001970

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

The undersigned counsel would respectfully request an order allowing him to file a petition for writ of certiorari in this case in excess of the twenty-five page limit imposed by Rule 243(e)(3), SCACR. In support of this motion, counsel would respectfully show the Court:

1. The petition for writ of certiorari and the appendix in this case are due on December 21, 2014. The appendix is over nine hundred pages, and numerous meritorious issues were raised during the post-conviction hearings.

2. Counsel does not think that justice to the highly unusual and extensive procedural history of this murder conviction can be done in the twenty-five pages authorized by Rule 243(e)(3), SCACR.

3. Consequently, counsel respectfully moves that this Court allow him to file a petition for a writ of certiorari not in excess of fifty pages. Counsel has made every effort for brevity.

4. Opposing counsel, Daniel Gourley, of the Office of the Attorney General, graciously does not oppose this request as indicated by his signature below.

WHEREFORE, undersigned counsel would respectfully request an order from this Court granting him the right to exceed the twenty-five page limit of Rule 243(e)(3), SCACR. Counsel would also request that the order grant him the right to file a petition for a writ of certiorari in this case not exceed fifty pages.

Respectfully submitted,



John H. Strom
Appellate Defender

Attorney for Petitioner

I do not oppose this request



Daniel Gourley

December 21, 2015