

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Richland County

Robert E. Hood, Circuit Court Judge

RECEIVED

JUL 25 2016

SC SUPREME COURT

RONALD TILLMAN,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-002499

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

The undersigned counsel would respectfully request an order allowing her 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 July 25, 2016. The appendix and supplemental appendix total two thousand two hundred and seventy-nine (2279) pages.

2. The procedural history is quite extensive. Petitioner was charged with the murder that is the subject of collateral attack in December of 1988. His trial occurred in January of 1990. He appealed that conviction immediately. However, when he filed an application for post-

conviction relief (PCR) in the 1990s, his application was dismissed without prejudice because he was in another jurisdiction. This decision was appealed and upheld by this Court, which provided for a one-year period after Petitioner returned to South Carolina in order to seek PCR. Petitioner filed another PCR application in the early 2000s, and again his action was dismissed because he remained in federal custody outside the state. Finally, in 2011, Petitioner filed a PCR application when he returned to South Carolina. The hearing on the application covered two days and included supplemental proceedings (a deposition and several affidavits).

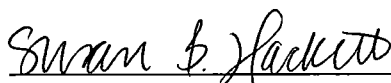
3. Counsel does not think that justice to the case can be done in the twenty-five pages authorized by Rule 243(e)(3), SCACR, in light of the voluminous procedural history and multi-day proceedings concerning the claims for relief.

4. Consequently, counsel respectfully moves that this Court allow her to file a petition for a writ of certiorari not in excess of thirty (30) pages. Counsel will make every effort for brevity.

5. Opposing counsel, Megan Harrigan Jameson, of the Office of the Attorney General, graciously does not oppose this request as indicated by her signature below.

WHEREFORE, undersigned counsel would respectfully request an order from this Court granting her 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 in excess of thirty (30) pages.

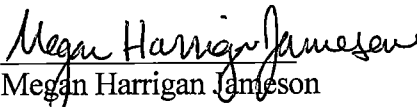
Respectfully submitted,



Susan B. Hackett
Appellate Defender

Attorney for Petitioner

I do not oppose this request


Megan Harrigan Jameson

July 25, 2016

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Richland County
Robert E. Hood, Circuit Court Judge

RONALD TILLMAN,

PETITIONER,

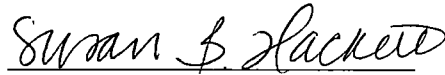
V.

STATE OF SOUTH CAROLINA,

RESPONDENT

CERTIFICATE OF SERVICE

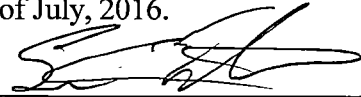
I certify that a true copy of the petition to file a petition for writ of certiorari in excess of the twenty-five page limit has been served on Megan Harrigan Jameson, Esquire, at the Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, at Mr. Ronald Tillman #222153, at Broad River Correctional Institution, 4460 Broad River Road, Columbia, SC 29210 this 25th day of July, 2016.



Susan B. Hackett
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 25th day
of July, 2016.



(L.S.)

Notary Public for South Carolina
My Commission Expires: October 30, 2022.