

STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
Honorable L. Casey Manning, Circuit Court Judge

Appellate Case No. 2016-000415

CLINTON FOLKES, 216506,

v.

STATE OF SOUTH CAROLINA,

RECEIVED
OCT 07 2016
PETITIONER,
S.C. SUPREME COURT

RESPONDENT.

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

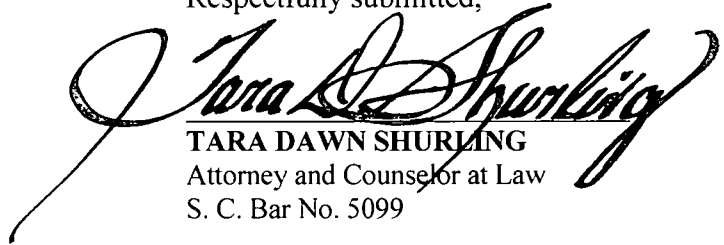
Now comes the Petitioner, acting by and through his undersigned counsel, in the above captioned Post-Conviction Relief Appeal requesting that this Honorable Court grant her leave to exceed the page limit for a Petition for Writ of Certiorari set forth in Rule 243(e)(3), SCACR. The Petitioner respectfully 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 forty-six (46) pages long. On appeal, the Petitioner seeks review of the lower court's denial of relief on fourteen (14) grounds which PCR Counsel has grouped into ten (10) 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),

AS

SCACR. For this reason, the Petitioner asks that her 51 page Petition for Writ of Certiorari, counting the cover page and Certificates of Service, be accepted for filing.

Respectfully submitted,



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

3614 Landmark Drive, Suite A
Columbia, S. C. 29204

(803) 738-8622
(803) 738-1600 (FAX)
tdslaw@shurlinglaw.com

ATTORNEY FOR PETITIONER.

This the 4th day of October, 2016.

STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
Honorable L. Casey Manning, Circuit Court Judge

Appellate Case No. 2016-000415

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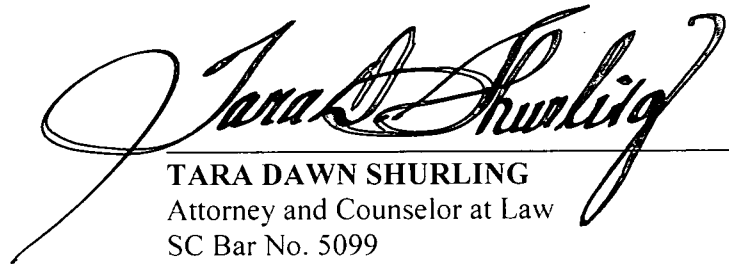
STATE OF SOUTH CAROLINA,

RESPONDENT.

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a copy of the Motion to Enlarge Page Limitation for Petition for Writ of Certiorari in the above-entitled case has been served upon opposing counsel this the 4th day of October, 2016, by mailing one (1) copy in a stamped envelope properly addressed to:

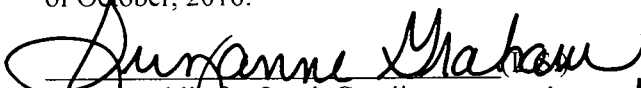
Megan H. Jameson
Assistant Attorney General
Office of the Attorney General
P. O. Box 11549
Columbia, SC 29211



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

ATTORNEY FOR PETITIONER.

SWORN TO BEFORE me this 4th day
of October, 2016.


Notary Public for South Carolina
My Commission Expires: 2/28/24

LAW OFFICE OF



TARA DAWN SHURLING, PA

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October 4, 2016

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OCT 07 2016

S.C. SUPREME COURT

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

Re: Clinton Folkes, #216506 v. State of South Carolina; 2016-000415.

Dear Mr. Shearouse:

Enclosed for filing please find the original and eight (8) copies of the Motion to Enlarge Page Limitations for Petition for Writ of Certiorari and the Certificate of Service in the above-captioned case. I would appreciate you returning the extra two (2) clocked copies of the Motion to me in the envelope provided. Thank you for your assistance in this matter. I remain,

Sincerely yours,

A handwritten signature in cursive script that reads "Tara Dawn Shurling".

Tara Dawn Shurling
Attorney and Counselor at Law

TDS/sm

Enclosures

cc: Megan H. Jameson, Assistant Attorney General (w/enclosures)
Clinton Folkes, #216506 (w/enclosures)
Lilieth P. Folkes (w/out enclosures)