

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

ORIGINAL

Certiorari to the Court of Appeals
Appeal from Abbeville County
Donald B. Hocker, Circuit Court Judge

RECEIVED

FEB 21 2017

S.C. SUPREME COURT

THE STATE,

RESPONDENT,

V.

KEITH DENVER TATE,

PETITIONER

APPELLATE CASE NO. 2017-000230

PETITION 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 a petition for writ of certiorari to the Court of Appeals in this case in excess of the twenty-five (25) page limit imposed by Rule 242(d)(4), SCACR. In support of this motion, counsel presents the following:

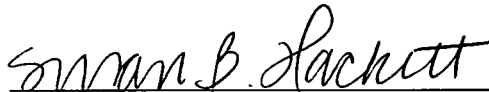
1. The petition for writ of certiorari and the appendix in this case are due today, February 21, 2017.
2. Counsel has raised three significant issues, which require discussion of the factual background and relevant legal principles. In light of the legal significance of these issues and the lengthy factual circumstances surrounding these issues, justice to the issues presented cannot be done in the twenty-five (25) pages authorized by Rule 242(d)(4), SCACR.

3. Consequently, counsel respectfully moves that this Court to allow her to file a petition for a writ of certiorari not in excess of thirty-two (32) pages. Counsel has made every effort for brevity.

4. Opposing counsel, V. Henry Gunter, Jr., of the Office of the Attorney General, graciously does not oppose this request as indicated by his signature below.

WHEREFORE, undersigned counsel respectfully requests an order from this Court granting her the right to exceed the twenty-five (25) page limit of Rule 242(d)(4), SCACR. Counsel also requests that the order grant her the right to file a petition for a writ of certiorari in case not in excess of thirty-two (32) pages.

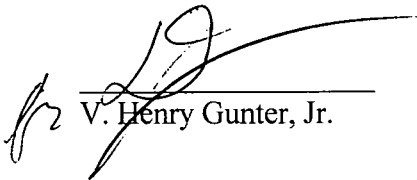
Respectfully submitted,



Susan B. Hackett
Appellate Defender

Attorney for Petitioner

I do not oppose this request


V. Henry Gunter, Jr.

February 21, 2017

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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THE STATE,

RESPONDENT,

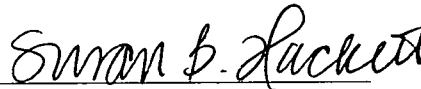
V.

KEITH DENVER TATE,

PETITIONER

CERTIFICATE OF SERVICE

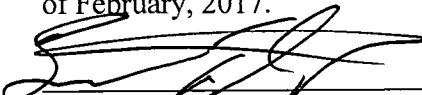
I certify that a true copy of the petition to file a petition for writ of certiorari in excess of the twenty-five page limit has been served on V. Henry Gunter, Jr., Esquire, at the Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, and Mr. Keith Denver Tate #236480, at McCormick Correctional Institution, 386 Redemption Way, McCormick, SC 29899, this 21st day of February, 2017.



Susan B. Hackett
Assistant Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 21st day
of February, 2017.



(L.S.)

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