

THE STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

CERTIORARI FROM CHEROKEE COUNTY

The Honorable Frank R. Addy, Jr., Circuit Court Judge

Appellate Case No: 2017-000758

John B. Bonner,

Respondent,

v.

State of South Carolina,

Petitioner.

**MOTION TO EXCEED PAGE LIMIT FOR THE *AMENDED* PETITION FOR WRIT OF CERTIORARI**

Petitioner respectfully asks this Court to allow Respondent to file the *Amended* Petition for Writ of Certiorari in excess of the twenty-five page limit imposed by Rule 243(e)(3), SCACR. Petitioner will require approximately twenty-eight (28) pages. Petitioner now requests this Court to accept the filing of the *Amended* Petition for Writ of Certiorari herewith this motion. The Court should grant this motion because of the importance of the issues involved. Specifically, the issues involve the unsettled question of whether Graham v. Florida<sup>1</sup> precludes individual or aggregate term of year sentences as *de facto* life sentences. Petitioner has diligently attempted to trim the brief, but finds it necessary to request the Court's permission to exceed the twenty-five page limit. The undersigned counsel has contacted Lindsey S. Vann, opposing counsel, for consent via email and she has no objections to this request. Petitioner respectfully requests an

<sup>1</sup> 560 U.S. 48 (2010).

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S.C. SUPREME COURT

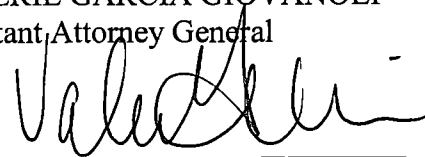
order from this Court granting Petitioner permission to exceed the twenty-five page limit of Rule 243.

Respectfully submitted,

ALAN WILSON  
Attorney General

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Assistant Attorney General

BY: \_\_\_\_\_



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November 29, 2017