

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

\_\_\_\_\_

Certiorari to Jasper County

Honorable Michael G. Nettles, Circuit Court Judge

RECEIVED

MAY 30 2018

THE STATE,

S.C. SUPREME COURT  
RESPONDENT,

V.

BILLY PHILLIPS,

PETITIONER

APPELLATE CASE NO. 2016-000108

\_\_\_\_\_

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

\_\_\_\_\_

Counsel for Petitioner, Billy Phillips, respectfully requests an order to allow filing the petition for writ of certiorari 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 was timely filed on May 29, 2018. The petition, however, exceeds the twenty-five (25) page limit and is thirty-eight (38) pages in length.

2. The record on appeal in this trial for murder is 656 pages. Counsel raised two issues in the petition for writ of certiorari. The issues raised are complicated both legally and factually. Counsel made every effort to draft the petition in as concise a manner as possible. Based on the length of the record, however, and the nature of the issues raised counsel was unable

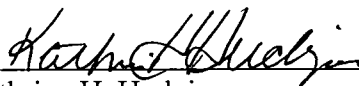
to adequately address the issues in the twenty-five (25) page limit imposed by Rule 242(d)(4), SCACR.

3. Counsel respectfully moves this Court to allow the filing of the petition for writ of certiorari in excess of the twenty-five (25) page limit imposed by Rule 242(d)(4), SCACR.

4. Opposing counsel, Melody J. Brown, Senior Assistant Deputy Attorney General, consents to this request as indicated by her signature below.

Based upon the above showing, counsel respectfully requests an order from this Court granting the right to exceed the twenty-five (25) pages authorized by Rule 242(d)(4), SCACR. Counsel also requests that the order accept the petition for writ of certiorari in the case as filed, being thirty-eight (38) pages in length.


Respectfully submitted,

  
\_\_\_\_\_  
Kathrine H. Hudgins  
Appellate Defender

Attorney for Petitioner

May 30, 2018

I consent:

  
\_\_\_\_\_  
Melody J. Brown, Esquire

for

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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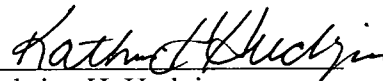
V.

BILLY PHILLIPS,

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 Melody J. Brown, Esquire, at the Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201 this 30th day of May, 2018.



Kathrine H. Hudgins  
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 30th day  
of May, 2018.

 (L.S.)

Notary Public for South Carolina

My Commission Expires: July 5, 2027.