

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Sumter County  
George C. James, Circuit Court Judge  
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ORIGINAL

RECEIVED

MAR 12 2019

PETITIONER,  
S.C. SUPREME COURT

NATHANIEL BRADLEY,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2018-001121

\_\_\_\_\_  
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 March 18, 2019. The appendix and supplemental appendix are almost two thousand pages cumulatively. Petitioner's trial consisted of over one thousand pages, and his PCR hearing comprised almost four hundred pages. At the PCR hearing, Petitioner raised almost twenty issues. Three expert witnesses were called at the PCR hearing in addition to Petitioner, a lay witness, and trial counsel. Judge James's order denying relief is forty-six pages long.

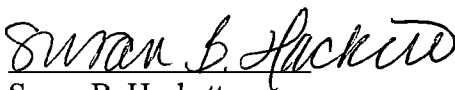
2. Counsel intends to raise seven issues. Counsel has made every effort for conciseness and brevity. However, in order to provide this Court with the facts as presented at trial and the facts necessary to understand the issues in the PCR action, it is necessary to exceed the twenty-five-page limit.

3. Consequently, counsel respectfully moves that this Court allow her to file a petition for a writ of certiorari not in excess of thirty pages.

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

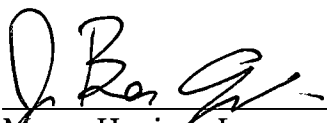
WHEREFORE, undersigned counsel would respectfully request an order from this Court granting her the right to exceed the twenty-five-page limit of Rule 243(e)(3), SCACR. Counsel would also request that the order grant her the right to file a petition for a writ of certiorari in this case not in excess of thirty pages.

Respectfully submitted,

  
Susan B. Hackett  
Appellate Defender

Attorney for Petitioner

I do not oppose this request

  
Megan Harrigan Jameson  
March 12, 2019

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Appeal from Sumter County

George C. James, Circuit Court Judge

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NATHANIEL BRADLEY,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

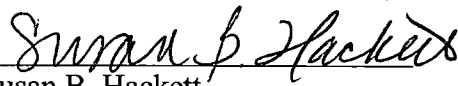
RESPONDENT

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CERTIFICATE OF SERVICE

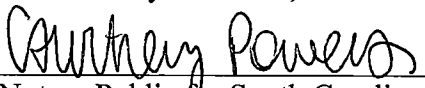
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I certify that a true copy of the petition to file a petition for writ of certiorari in excess of the twenty-five-page limit has been served on Megan Harrigan Jameson, Esquire, at the Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201 this 12<sup>th</sup> day of March, 2019.

  
Susan B. Hackett  
Appellate Defender

ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me  
this 12th day of March, 2019.

 (L.S)  
Notary Public for South Carolina  
My Commission Expires: May 2, 2027.