

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Charleston County

Thomas A. Russo, Circuit Court Judge  
\_\_\_\_\_

ROBERT LEE WRIGHT,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2018-002249  
\_\_\_\_\_

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 July 8, 2019. The appendix is 1,284 pages, and numerous meritorious issues were raised during the post-conviction relief hearing.

2. Counsel does not think that justice this can be done in the twenty-five pages authorized by Rule 243(e)(3), SCACR. Undersigned counsel has raised four issues to be considered in the certiorari petition. All issues involve the federal constitutional guarantee of the right to the effective assistance of counsel. One issue concerns a burgeoning matter of expert witnesses acting

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S.C. SUPREME COURT

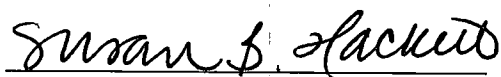
as conduits for other expert witnesses in violation of the Confrontation Clause. Two issues involve erroneous jury instructions. The fourth issue involves pitting, which is a well-known and oft-heard objection, but for which there tend to be few matters raised on appeal. Thus, the wide-range of issues require considerable discussion of the facts of the case and of the legal authorities. Therefore, undersigned counsel requests permission to exceed the page limits.

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

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-four pages.

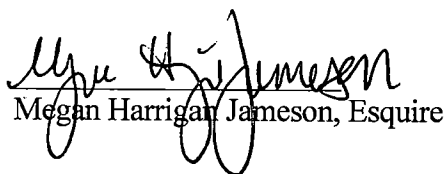
Respectfully submitted,



Susan B. Hackett  
Appellate Defender

Attorney for Petitioner

I do not oppose this request



Megan Harrigan Jameson, Esquire

July 8, 2019

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Charleston County  
Thomas A. Russo, Circuit Court Judge  
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ROBERT LEE WRIGHT,

PETITIONER,

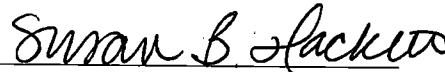
V.

STATE OF SOUTH CAROLINA,

RESPONDENT

\_\_\_\_\_  
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 Megan Harrigan Jameson, Esquire, at the Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201 this 8th day of July, 2019.



Susan B. Hackett  
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 8th day  
of July, 2019.

 (L.S.)  
Notary Public for South Carolina

My Commission Expires: July 26, 2028