

STATE OF SOUTH CAROLINA
In the Supreme Court

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JUL 16 2019

CERTIORARI TO RICHLAND COUNTY
Court of Common Pleas
The Honorable J. Derham Cole, Circuit Court Judge

S.C. SUPREME COURT

Appellate Case No. 2018-001688

ADONIS WILLIAMS,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT.

**MOTION TO EXCEED AND EXTEND PAGE LIMITS IN
RETURN TO PETITION FOR WRIT OF CERTIORARI**

Respondent, the State, moves this Court grant leave to exceed the page limitation set for Returns to Petitions for Writ of Certiorari by Rule 243(g), SCACR. In support of the request, undersigned counsel would respectfully show the Court:

1. The Return to Petition for Writ of Certiorari is due to be filed with the Court on Thursday, July 29, 2019. The Court has granted Respondent three previous extensions.
2. The Return is responsive to a Petition for Writ of Certiorari that is 37 substantive pages in length, and which raises 10 issues on appeal.
3. The undersigned has diligently endeavored to minimize the length of the Return to as close to the page limits set forth in the rules as possible:
 - a. Respondent has reframed Petitioner's issues as 10 issues presented;
 - b. Respondent has excluded all unnecessary detail, perhaps to detriment,

excluding a traditional singular Statement of the Facts in favor of those facts from the record most immediately necessary to each issue raised;

- i. However, Respondent did include additional citations to the record omitted by Petitioner, in an effort to give a full and accurate record demonstrating the propriety of the PCR judge's findings.
 - c. Respondent has refrained from exhaustive citation of cases, which may be persuasive, but not strictly necessary for the good faith assertion of authority;
 - d. Respondent has exercised professional judgment to the best of his ability in order to provide exceedingly brief responses to those issues which, in his opinion, may be simply dispensed, with the earnest hope that to the extent this judgment is exercised in error the State may be permitted to respond more fully in briefing.
4. As a result of the above listed efforts to minimize the length of the filing in excess of the rules, the State's Return totals 43 pages in length, including the cover page, the table of contents, and other formatting required by the SCACR, and is filed concurrent with this motion.

Wherefore, Respondent respectfully requests this Court relax the rules to permit the filing and review of the Return to Petition for Writ of Certiorari, concurrently filed.

Respectfully submitted,



WILLIAM F. SCHUMACHER, IV
Bar # 100231
Office of the Attorney General
Post Office Box 11549
Columbia, SC 29211
(803) 734-3727
Attorney for Respondent

July 16, 2019

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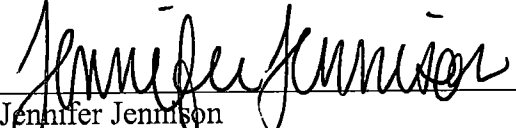
RESPONDENT.

CERTIFICATE OF SERVICE

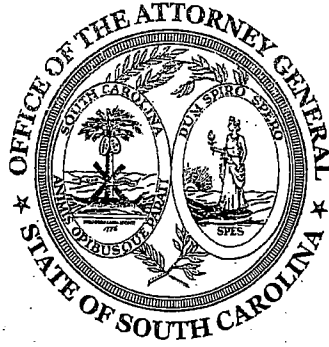
The undersigned hereby certifies that a true copy of the **Motion to Exceed And Extend Page Limits in Return to Petition for Writ of Certiorari** has been served upon the applicant by hand-delivering two copies via interagency mail, addressed to:

**Kathrine H. Hudgins, Esquire
S.C. Commission on Indigent Defense
PO Box 11589
Columbia SC 29201**

This 16th day of July, 2019.



Jennifer Jennison
Legal Assistant for Respondent



ALAN WILSON
ATTORNEY GENERAL

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July 16, 2019

S.C. SUPREME COURT

The Honorable Daniel E. Shearouse
Clerk of Court — SC Supreme Court
Post Office Box 11330
Columbia, South Carolina 29211

RE: Adonis Williams v. State of South Carolina
Appellate Case No.: 2018-001688

Dear Mr. Shearouse:

Enclosed please find the original and six copies of the **Motion to Exceed And Extend Page Limits in Return to Petition for Writ of Certiorari** in the above matter for filing. Please let me know if anything additional is needed.

Sincerely,

William F. Schumacher, IV
Assistant Attorney General
S.C. Bar # 100231

WFS/jj
Enclosures

cc: Kathrine H. Hudgins, Esquire
Victim Advocacy Division