

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Dorchester County

Honorable Maite Murphy, Circuit Court Judge  
\_\_\_\_\_

THE STATE,

RESPONDENT,

V.

FELIX KOTOWSKI,

PETITIONER

\_\_\_\_\_  
MOTION TO EXCEED TWENTY-FIVE  
PAGE LIMIT FOR A PETITION FOR  
WRIT OF CERTIORARI  
TO THE COURT OF APPEALS  
\_\_\_\_\_

The undersigned counsel would respectfully request an order allowing her to file a Petition for Writ of Certiorari to the Court of Appeals in this case in excess of the twenty-five page limit imposed by Rule 242(d)(4), SCACR. In support of this motion, counsel would respectfully show the Court:

1. The Petition for Writ of Certiorari to the Court of Appeals and the appendix in this case are due to be served and filed on July 22, 2019.
2. Three fact intensive issues were raised on direct appeal. Counsel does not think that justice to the facts and argument of this case can be done in the twenty-five pages authorized by Rule 242(d)(4), SCACR.

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S.C. SUPREME COURT


3. Consequently, counsel respectfully moves that this Court allow her to file a Petition for Writ of Certiorari to the Court of Appeals not in excess of thirty-four pages. Counsel has made every effort for brevity.

4. Opposing counsel, David A. Spencer, of the Office of the Attorney General, graciously does not oppose this request as indicated by his signature below.

5. The Petition for Writ of Certiorari to the Court of Appeals and the appendix are being filed simultaneously with this motion.

WHEREFORE, undersigned counsel would respectfully request an order from this Court granting her the right to exceed the twenty-five page limit of Rule 242(d)(4), SCACR. Counsel would also request that the order grant her the right to file a Petition for Writ of Certiorari to the Court of Appeals not in excess of thirty-four pages.

Respectfully submitted,



Lara M. Caudy  
Appellate Defender

Attorney for Petitioner

I do not oppose this request:



David A. Spencer

July 22, 2019

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Dorchester County

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Honorable Maite Murphy, Circuit Court Judge JUL 22 2019

S.C. SUPREME COURT

THE STATE,

RESPONDENT,

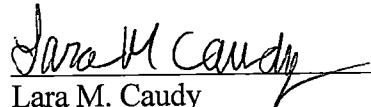
V.

FELIX KOTOWSKI,

PETITIONER

\_\_\_\_\_  
CERTIFICATE OF SERVICE  
\_\_\_\_\_

I certify that a true copy of the Motion to Exceed Twenty-Five Page Limit for a Petition for Writ of Certiorari to the Court of Appeals has been served on David A. Spencer, Esquire, at Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 22nd day of July, 2019.

  
\_\_\_\_\_  
Lara M. Caudy  
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 22nd day of July, 2019.

 (L.S.)

Notary Public for South Carolina  
My Commission Expires: September 27, 2028.