

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

ORIGINAL

Appeal from Horry County

Honorable Benjamin H. Culbertson, Circuit Court Judge

THE STATE,

RESPONDENT,

v.

TAMMY CAISON MOORER,

APPELLANT

APPELLATE CASE NO. 2018-001938

RECEIVED
JAN 03 2020
SC Court of Appeals

MOTION TO EXCEED FIFTY
PAGE LIMIT FOR AN INITIAL
BRIEF OF APPELLANT

The undersigned counsel would respectfully request an order allowing her to file an initial brief of appellant in this case in excess of the fifty page limit imposed by Rule 208(b)(5), SCACR. In support of this motion, counsel would respectfully show the Court:

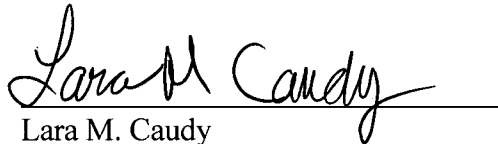
1. The initial brief of appellant and designation of matter in this case are due to be served and filed on January 6, 2020.
2. Five fact intensive issues are raised in the initial brief, including an issue concerning the denial of a directed verdict. The trial in this case lasted twelve days and the transcripts span two thousand six hundred and seventy-two pages. Counsel does not think that justice to the facts and argument of this case can be done in the fifty pages authorized by Rule 208(b)(5), SCACR.

3. Consequently, counsel respectfully moves that this Court allow her to file an initial brief of appellant not in excess of sixty pages. Counsel has made every effort for brevity.

4. Opposing counsel, William M. Blich, Jr., of the Office of the Attorney General, graciously does not oppose this request as indicated by his signature below.

WHEREFORE, undersigned counsel would respectfully request an order from this Court granting her the right to exceed the fifty page limit of Rule 208(b)(5), SCACR. Counsel would also request that the order grant her the right to file an initial brief of appellant not in excess of sixty pages.

Respectfully submitted,

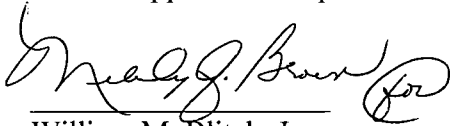


Lara M. Caudy
Appellate Defender

Robert M. Dudek
Chief Appellate Defender

Attorneys for Appellant

I do not oppose this request:



William M. Blich, Jr.

January 3, 2020

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Horry County

Honorable Benjamin H. Culbertson, Circuit Court Judge

THE STATE,

RESPONDENT,

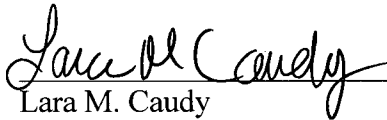
V.

TAMMY CAISON MOORER,

APPELLANT

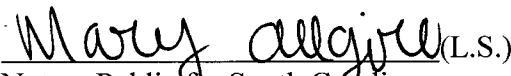
CERTIFICATE OF SERVICE

I certify that a true copy of the Motion to Exceed Fifty Page Limit for an Initial Brief of Appellant has been served on William M. Blich, Jr., Esquire, at Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 3rd day of January, 2020.


Lara M. Caudy
Appellate Defender

ATTORNEY FOR APPELLANT

SWORN TO BEFORE ME this 3rd day
of January, 2020.


Mary Alljire (L.S.)
Notary Public for South Carolina
My Commission Expires: May 12, 2027.