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STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

S.C. SUPREME COURT

Appeal from Aiken County
Court of General Sessions
The Honorable R. Lawton McIntosh, Circuit Court Judge

Opinion No. 2020-UP-018 (S.C. Ct. App. filed January 29, 2020)
Supreme Court Case No. 2020-000653; Court of Appeals Case No. 2016-001835

THE STATE

RESPONDENT,

V.

KELVIN JONES,

PETITIONER.

**MOTION TO EXCEED PAGE LIMITS FOR THE
RETURN TO PETITION FOR WRIT OF CERTIORARI**

Undersigned counsel for the State respectfully moves for an order allowing the State to file its Return to the Petition for Writ of Certiorari in excess of the twenty-five (25) page limit imposed by Rule 242(f), SCACR. In support of this motion, counsel would respectfully show the Court:

1. The State's Return is due to be served and filed in this Court today, July 1, 2020.
2. The Petition for Writ of Certiorari is thirty-one (31) pages in length. Petitioner raised four issues in his petition. The record on appeal is six hundred and thirteen (613) pages in length.
3. On May 1, 2020, the Court granted petitioner's Motion to Exceed the Page Limits.

The State did not oppose petitioner's motion.

4. Undersigned counsel has completed the State's Return. In order to adequately respond to the issues raised in the petition, the return exceeds the twenty-five page limit. Counsel has diligently attempted to trim the length of the return, but finds it necessary to request the Court's permission to exceed the standard page limit. The Return is twenty-eight (28) pages in length.

5. On July 1, 2020, counsel for the State emailed opposing counsel, Katherine H. Hudgins, to inquire whether she would object to this motion. The State learned that Ms. Hudgins is on vacation today. Therefore the State contacted Robert Dudek who consented to the Motion to Exceed Page Limits on Ms. Hudgins behalf.

WHEREFORE, undersigned counsel would respectfully request an order from this Court granting petitioner permission to exceed the twenty-five page limit of Rules 242(f), SCACR.

Respectfully Submitted,

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July 1, 2020.