

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Spartanburg County
J. Derham Cole, Circuit Court Judge

RECEIVED
Mar 05 2021

S.C. SUPREME COURT

ANDRES ANTONIO TORRES,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2020-000842

PETITION TO EXCEED TWENTY-FIVE
PAGE LIMIT FOR A PETITION FOR
A WRIT OF CERTIORARI

The undersigned counsel would respectfully request an order allowing him 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 accompanying appendices in this death penalty case are due on March 5, 2021. The eleven-volume appendix is in excess of five thousand, three hundred (5,300) pages. Additionally, there is one supplemental appendix. Four very meritorious issues have been identified and briefing those four issues is in progress.

2. Counsel does not think that justice to the highly unusual facts of this case, and the four issues to be raised, can be done by the twenty-five pages authorized by Rule 243(e)(3),

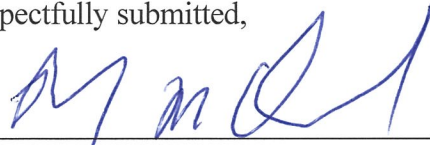
SCACR. Further, this death penalty case involves very technical, genetic, psychiatric, and pharmacologic evidence.

3. Consequently, counsel respectfully moves that this Court allow him to file a petition for a writ of certiorari not in excess of ninety-five (95) pages. Counsel will make every effort for brevity, and hopefully will be short of that ninety-five page limit in the final analysis.

4. Counsel has consulted with opposing counsel, Melody J. Brown, of the Office of the Attorney General, and she graciously does not oppose this request.

WHEREFORE, undersigned counsel would respectfully request an order from this Court granting him the right to exceed the twenty-five page limit of Rule 243(e)(3), SCACR. Counsel would also request that the order grant him the right to file a petition for a writ of certiorari in this death penalty case not in excess of ninety-five (95) pages.

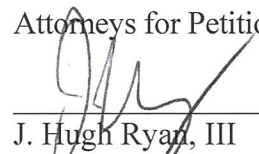
Respectfully submitted,



Robert M. Dudek
Chief Appellate Defender

Susan B. Hackett
Appellate Defender

Attorneys for Petitioner



J. Hugh Ryan, III
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Deputy General Counsel and Training
Director

March 5, 2021