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Jun 15 2021

S.C. SUPREME COURT

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

On Petition of Writ of Certiorari to Orangeburg County
Court of Common Pleas
The Honorable Craig D. Brown, Post-Conviction Relief Judge
The Honorable Edgar W. Dickson, Trial Judge

Appellate Case No. 2020-000896

JULIAN YOUNG, #352043, Respondent/Petitioner,

vs.

STATE OF SOUTH CAROLINA, Petitioner/Respondent.

**MOTION TO ENLARGE PAGE LIMIT FOR
RETURN TO PETITIONER/RESPONDENT'S
PETITION FOR WRIT OF CERTIORARI**

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ATTORNEY FOR RESPONDENT/PETITIONER

NOW COMES the Respondent/Petitioner, acting by and through his undersigned counsel, asking for leave of Court to exceed the page limitation set for Petitions for Writ of Certiorari by Rule 227 (e) (3), SCRAP. Respondent/Petitioner acknowledges that when she previously filed her Return in this matter she advised the Court that a Motion to exceed the page limit would be forthcoming. She apologizes to this Honorable Court for failing to subsequently communicate with the Court concerning the fact that certain ongoing health issues had prohibited her from doing so. She now respectfully ask this Court to reconsider it's previous ruling and accept the Return submitted on today's date despite the fact that it exceeds the page limit set by Rule 227 by nine (9) pages. The Return previously submitted by undersigned Counsel was forty-eight (48) pages long. Counsel has now successfully reduced it to thirty-four (34) pages. The order of the PCR Court granting Respondent/Petitioner a new trial was itself ninety-five (95) pages long. Despite problems arising from recently diagnosed severe stenosis of the cervical spine Counsel has continued to work, but has had to limit her hours at a computer in order to mitigate significant pain.

Counsel has made a real effort to reduce the length of this pleading to at, or below, twenty-five (25) pages, but has simply been unable to do so without compromising her client's right to be adequately heard on the many issues addressed in Judge Brown's ninety-five (95) page Order. For these reasons, Counsel most respectfully prays that the Court grant her request to exceed the twenty-five page limit by nine (9) pages.

Respectfully submitted,

/Tara D. Shurling

Tara Dawn Shurling
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ATTORNEY FOR YOUNG

This 14th day of June, 2021