

STATE OF WISCONSIN  
IN SUPREME COURT  
Case No. 00-0064-CR



STATE OF WISCONSIN,  
Plaintiff-Respondent-Petitioner,

v.

CARROLL D. WATKINS,  
Defendant-Appellant.

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MOTION FOR PERMISSION TO FILE OVERSIZED BRIEF

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Carroll Watkins, by his attorney, Steven P. Weiss, Assistant State Public Defender, respectfully moves the court to enter an order allowing the filing of an oversized brief, not to exceed 11,500 words. As grounds for, and in support of this motion, counsel shows the court as follows:

1. This case is before the court on the state's petition for review. In addition to the issue decided by the court of appeals in this case, in favor of Watkins, the court of appeals did not reach several additional issues.
2. Counsel has diligently attempted to shorten his brief to the maximum extent possible, while still preparing a brief worthy of the Supreme Court, and covering the issues raised by the state in their brief, and

petition, as well as addressing the additional issues, left undecided by the court of appeals. After aggressive editing, counsel is still unable to file a brief of only 11,000 words.

3. The state was previously allowed to file an oversized brief-in-chief, not exceeding 17,000 words, and the state will be further permitted to file a reply brief.

4. I have been authorized to indicate in this motion that the state does not oppose the granting of this motion.

WHEREFORE, for the above reasons, the court is respectfully requested to enter an order permitting the filing of an oversized brief not to exceed 11,5000 words.

Dated this 26<sup>th</sup> day of September, 2001.

Respectfully submitted,



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cc: Stephen W. Kleinmaier  
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