

IN THE SUPREME COURT OF THE STATE OF MISSISSIPPI
No. 2024-TS-01178-SCT

CARLY MADISON GREGG
a/k/a CARLEY MADISON GREGG

APPELLANT

V.

STATE OF MISSISSIPPI

APPELLEE

MOTION TO FILE INITIAL BRIEF IN EXCESS OF FIFTY (50) PAGES

COMES NOW Appellant, Carly Madison Gregg a/k/a Carley Madison Gregg, by and through counsel, and respectfully moves this Court pursuant to Mississippi Rule of Appellate Procedure 28(h) for leave to file an initial brief in excess of fifty (50) pages. In support, Appellant shows:

1. Appellant's brief, despite counsel's diligent efforts to streamline and avoid duplication, modestly exceeds the fifty-page limit. Further reduction would materially impair a full and fair presentation of the issues.
2. This appeal arises from a prosecution of a fourteen-year-old and the imposition of a life-without-parole sentence, raising weighty constitutional questions under the Eighth and Fourteenth Amendments and their Mississippi counterparts.
3. The governing constitutional and statutory frameworks are unusually complex—implicating, *inter alia*, the juvenile-sentencing jurisprudence (e.g., *Miller/Montgomery/Jones*), recent amendments to Mississippi's homicide-sentencing statute and corresponding principles of statutory construction, and due-process requirements at sentencing—and require discussion beyond fifty pages to assist the Court.
4. Additional pages are necessary to address multiple preserved assignments of error as well as numerous errors that were not preserved yet should be considered under plain error doctrine, the

interaction of statutory text with parole eligibility, and the record's mental-health evidence and procedural rulings affecting sentencing.

5. No prejudice will result to Appellee; the State will have full opportunity to respond and, if needed, may seek reciprocal relief to exceed its page limit.

6. This request is made in good faith. Allowing an oversize brief will promote due process, fundamental fairness, and a complete, helpful presentation of the controlling issues.

WHEREFORE, PREMISES CONSIDERED, Appellant respectfully requests leave to file an initial brief exceeding fifty (50) pages, and for such other and further relief to which she may be entitled.

Respectfully submitted, this the 8th day of September, 2025.

Respectfully Submitted
CARLY MADISON GREGG a/k/a
CARLEY MADISON GREGG

BY: /s/James H. Murphy
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CERTIFICATE OF SERVICE

I, James H. Murphy, Attorney for Appellant, hereby certify that I have electronically filed the foregoing with the Clerk of the Court using the MEC system which sent notification of such filing to all counsel of record and the Clerk of the Supreme Court of Mississippi and the Court of Appeals.

This the 8th day of September, 2025.

/s/James H. Murphy